

VERBATIM <sup>1</sup>

RECORD OF TRIAL <sup>2</sup>

(and accompanying papers)

of

MANNING, Bradley E.

(Name: Last, First, Middle Initial)

Headquarters and  
Headquarters Company,  
United States Army Garrison  
(Unit/Command Name)

(Social Security Number)

U.S. Army

(Branch of Service)

PFC/E-3

(Rank)

Fort Myer, VA 22211

(Station or Ship)

By

GENERAL

COURT-MARTIAL

Convened by

Commander

(Title of Convening Authority)

UNITED STATES ARMY MILITARY DISTRICT OF WASHINGTON

(Unit/Command of Convening Authority)

Tried at

Fort Meade, MD

(Place or Places of Trial)

on

see below

(Date or Dates of Trial)

Date or Dates of Trial:

23 February 2012, 15-16 March 2012, 24-26 April 2012, 6-8 June 2012, 25 June 2012, 16-19 July 2012, 28-30 August 2012, 2 October 2012, 12 October 2012, 17-18 October 2012, 7-8 November 2012, 27 November - 2 December 2012, 5-7 December 2012, 10-11 December 2012, 8-9 January 2013, 16 January 2013, 26 February - 1 March 2013, 8 March 2013, 10 April 2013, 7-8 May 2013, 21 May 2013, 3-5 June 2013, 10-12 June 2013, 17-18 June 2013, 25-28 June 2013, 1-2 July 2013, 8-10 July 2013, 15 July 2013, 18-19 July 2013, 25-26 July 2013, 28 July - 2 August 2013, 5-9 August 2013, 12-14 August 2013, 16 August 2013, and 19-21 August 2013.

<sup>1</sup> Insert "verbatim" or "summarized" as appropriate. (This form will be used by the Army and Navy for verbatim records of trial only.)

<sup>2</sup> See inside back cover for instructions as to preparation and arrangement.

**From:** Bennett, Jessica D SSG USARMY (US)  
**To:** Fein, Ashdon MAJ USARMY MDW (US)  
**Cc:** David E. Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US)  
**Subject:** Request for additional funding request for Cyberagents Inc.- Trent Struttman (UNCLASSIFIED)  
**Date:** Wednesday, June 19, 2013 12:16:44 PM  
**Attachments:** Request for additional funding request for Cyberagents Inc..docx  
Request for additional funding request for Cyberagents Inc..pdf

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Classification: UNCLASSIFIED

Caveats: NONE

Good Afternoon,

Attached is the request for additional Funding for the Defense computer forensics expert. Please advise the Defense on any additional information needed. Thank you.

V/R

SSG Bennett, Jessica

Classification: UNCLASSIFIED

Caveats: NONE

From: Tooman, Joshua J CPT USARMY (US)  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); David Coombs  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel  
M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US);  
Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY  
USAMDW (US)  
Subject: RE: Stips  
Date: Wednesday, June 19, 2013 8:58:34 AM

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Roger. SSG Bennett will be over this morning to pick up the disc. We will have several of the first batch over to you today for your review.

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From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Tuesday, June 18, 2013 5:31 PM  
To: Hurley, Thomas F MAJ USARMY (US); David Coombs; Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);  
Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)  
CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,  
Derek D SGT USARMY USAMDW (US)  
Subject: Stips

Gents,

We finished the following stipulations:

1. Seche
2. Feeley
3. Mundy
4. Janek
5. #23
6. #107
7. Murphy

Attached is Murphy. We have Seche, Feeley, Mundy, and Janek on a classified CD ready for delivery. We sent #23 and #107 to their organization for review and should have back in a day or so. For Mundy and Janek, we accepted all the changes you made, and added a few edits based on their feedback.

We still do not have an answer on Wisecarver and Johnson, G. But for these two, we are not tracking any more stipulations in our control. The defense has the rest and we are standing by for feedback.

v/r  
MAJ Fein

From: Fein, Ashden MAJ USARMY MDW (US)  
To: Hurley, Thomas F MAJ USARMY (US); David Coombs; Tooman, Joshua J CPT USARMY (US)  
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Bcc: Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy F CIV (US)  
Subject: Stips  
Date: Tuesday, June 18, 2013 5:30:00 PM  
Attachments: 130618 (1727)-Stipulation of Expected Testimony (MurphyN).docx

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Gents,

We finished the following stipulations:

1. Seche
2. Feeley
3. Mundy
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Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY  
USAMDW (US)  
Subject: RE: Stip-Update  
Date: Monday, June 17, 2013 8:05:36 AM

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Sir

What's the deal with Benthal? Have you all tracked him down?

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Monday, June 17, 2013 7:40 AM  
To: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);  
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CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,  
Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Update

MAJ Hurley,

If 107 and 23 have stips, then 63 should no longer be needed. With Downey stip, Collins drops off. I was incorrect with Janek and Mundy. We are still waiting to hear back from them as of Friday.

Harward should be on its way shortly.

v/r  
MAJ Fein

-----Original Message-----

From: Hurley, Thomas F MAJ USARMY (US)  
Sent: Monday, June 17, 2013 7:38 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);  
Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)  
CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,  
Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Update

MAJ Fein

1. You guys still calling #63?
2. Does a signed Downey stip mean that Collins falls off of the list?
3. We have Janek and Mundy? The last thing we could find yesterday was us sending back corrections to you guys.

Thanks.

MAJ Hurley

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From: Fein, Ashden MAJ USARMY MDW (US)

Sent: Sunday, June 16, 2013 11:07 PM

To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessie D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);  
Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alce)  
CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,  
Derek D SGT USARMY USAMDW (US)  
Subject: Stip-Update

Gents,

Below is a summary of outstanding stips.

1. Johnson, G - we owe an answer whether he would testify to the fact about express/implicit
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3. Pearce - defense has
4. Seche - government finishing and defense should receive tomorrow
5. Yamamoto - defense has
6. Yun - defense has
7. Feeley - government finishing and defense should receive tomorrow
8. Moore - defense has
9. Yavonovitch - defense has
10. Pittman - defense has
11. Murphy - State is reviewing
12. Janek - defense has
13. Mundy - defense has
14. Downey - complete, needs to be signed
15. Harward - government has to review
16. #107 - we will amend and write #23 so they are not cumulative
17. Bigelow - defense has
18. Williamson - complete, needs to be signed
19. Aboul-Encin - defense should receive tonight
20. #23 - see #107 above

v/r  
MAJ Fein

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To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
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Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY  
USAMDW (US)  
Subject: RE: Stip-Harward  
Date: Monday, June 17, 2013 8:00:59 AM

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MAJ Fein

Looks good. I will have the client review along with Downey and Williamson.

v/r  
MAJ Hurley

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Monday, June 17, 2013 11:53 AM  
To: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);  
Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)  
CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,  
Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Harward

MAJ Hurley,

Attached is the updated Harward Stipulation. We accepted all changes. Deleted the habeas mil-com litigation and made a few edits. Our proposal this morning is to have Motes and Woods laid out for you and PFC Manning to go through before 0930. Once we start, the MJ goes through the colloquy for those two. Then we recess, lay out the remaining ones we have executed with the evidence. Come back on and then she goes through the colloquy for the remainder, and we continue.

v/r  
MAJ Fein

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From: Hurley, Thomas F MAJ USARMY (US)  
Sent: Monday, June 17, 2013 7:34 AM  
To: Tooman, Joshua J CPT USARMY (US); Fein, Ashden MAJ USARMY MDW (US); David Coombs  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);  
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Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Harward

All

We won't need the last two sentences in the open source info (about habeas and mil-comm litigation). Sorry for any confusion.

My bad.

Tom

---

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 16, 2013 9:50 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessie D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);  
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CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,  
Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Harward

Harward comments attached. Apologies if you got this already, but I received an error message.

---

From: Fein, Ashden MAJ USARMY MDW (US)  
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Harward attached.

v/r  
MAJ Fein

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Subject: Stip-About-Enen  
Date: Monday, June 17, 2013 7:59:00 AM  
Attachments: 130617 (0800)-Stipulation of Expected Testimony (A-E).docx

---

Gents,

Aboul-Encin attached.

v/r  
MAJ Fein

-----Original Message-----

From: Hurley, Thomas F MAJ USARMY (US)  
Sent: Monday, June 17, 2013 7:38 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
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USAMDW (US); Garskadon, Amy F CIV (US)  
**Subject:** RE: Stip-Harward  
**Date:** Monday, June 17, 2013 7:53:00 AM  
**Attachments:** 130617 (0751)-Stipulation of Expected Testimony (HarwardR).docx

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USAMDW (US)  
Subject: RE: Stip-Update  
Date: Monday, June 17, 2013 7:40:00 AM

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Derek D SGT USARMY USAMDW (US)  
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Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY  
USAMDW (US)  
Subject: RE: Stip-Update  
Date: Monday, June 17, 2013 7:38:11 AM

---

MAJ Fein

1. You guys still calling #63?
2. Does a signed Downey stip mean that Collins falls off of the list?
3. We have Janek and Mundy? The last thing we could find yesterday was us sending back corrections to you guys.

Thanks.

MAJ Hurley

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 11:07 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);  
Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)  
CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,  
Derek D SGT USARMY USAMDW (US)  
Subject: Stip-Update

Gents,

Below is a summary of outstanding stip.

1. Johnson, G - we owe an answer whether he would testify to the fact about express/implied
2. Wisecarver - same as Johnson, G
3. Pearce - defense has
4. Seche - government finishing and defense should receive tomorrow
5. Yamamoto - defense has
6. Yun - defense has
7. Feeley - government finishing and defense should receive tomorrow
8. Moore - defense has
9. Yavonovitch - defense has
10. Pittman - defense has
11. Murphy - State is reviewing
12. Janek - defense has
13. Mundy - defense has
14. Downey - complete, needs to be signed
15. Harward - government has to review
16. #107 - we will amend and write #23 so they are not cumulative
17. Bigelow - defense has
18. Williamson - complete, needs to be signed
19. Aboul-Encin - defense should receive tonight
20. #23 - see #107 above

v/r

MAJ Fein

From: Fein, Ashden MAJ USARMY MDW (US)  
To: Hurley, Thomas F MAJ USARMY (US)  
Subject: RE: chat  
Date: Monday, June 17, 2013 7:34:00 AM

---

Sounds good.

-----Original Message-----

From: Hurley, Thomas F MAJ USARMY (US)  
Sent: Monday, June 17, 2013 7:28 AM  
To: Fein, Ashden MAJ USARMY MDW (US)  
Subject: RE: chat

MAJ Fein

We can talk this morning before the 802. I just wanted to "level the bubbles" on all of the stipulations.

MAJ Hurley

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Monday, June 17, 2013 1:40 AM  
To: Hurley, Thomas F MAJ USARMY (US)  
Subject: chat

MAJ Hurley- do you still want to chat tonight? I just saw that you asked for me to call. Thanks.

From: Hurley, Thomas F MAJ USARMY (US)  
To: Tooman, Joshua J CPT USARMY (US); Fein, Ashden MAJ USARMY MDW (US); David Coombs  
Cc: Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel  
M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US);  
Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY  
USAMDW (US)  
Subject: RE: Stip-Harward  
Date: Monday, June 17, 2013 7:33:59 AM

---

All

We won't need the last two sentences in the open source info (about habeas and mil-comm litigation). Sorry for any confusion.

My bad.

Tom

---

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 16, 2013 9:50 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);  
Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)  
CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,  
Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Harward

Harward comments attached. Apologies if you got this already, but I received an error message.

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 4:07 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);  
Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)  
CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,  
Derek D SGT USARMY USAMDW (US)  
Subject: Stip-Harward

Gents,

Harward attached.

v/r

MAJ Fein

From: Hurley, Thomas F MAJ USARMY (US)  
To: Fein, Ashden MAJ USARMY MDW (US)  
Subject: RE: chat  
Date: Monday, June 17, 2013 7:27:33 AM

---

MAJ Fein

We can talk this morning before the 802. I just wanted to "level the bubbles" on all of the stipulations.

MAJ Hurley

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Monday, June 17, 2013 1:40 AM  
To: Hurley, Thomas F MAJ USARMY (US)  
Subject: chat

MAJ Hurley- do you still want to chat tonight? I just saw that you asked for me to call. Thanks.



**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** Hurley, Thomas F MAJ USARMY (US)  
**Subject:** chat  
**Date:** Sunday, June 16, 2013 9:40:00 PM

---

MAJ Hurley- do you still want to chat tonight? I just saw that you asked for me to call. Thanks.

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
**Cc:** Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
**Bcc:** Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy E CIV (US)  
**Subject:** Stip-Update  
**Date:** Sunday, June 16, 2013 7:07:00 PM

---

Gents,

Below is a summary of outstanding stip.

1. Johnson, G - we owe an answer whether he would testify to the fact about express/implicit
2. Wisecarver - same as Johnson, G
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4. Seche - government finishing and defense should receive tomorrow
5. Yamamoto - defense has
6. Yun - defense has
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10. Pittman - defense has
11. Murphy - State is reviewing
12. Janek - defense has
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17. Bigclow - defense has
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19. Aboul-Encin - defense should receive tonight
20. #23 - see #107 above

v/r  
MAJ Fein

**From:** Tooman, Joshua J CPT USARMY (US)  
**To:** Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
**Cc:** Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
**Subject:** RE: Stip-Harward  
**Date:** Sunday, June 16, 2013 5:50:49 PM  
**Attachments:** Harward\_Stips.docx

---

Harward comments attached. Apologies if you got this already, but I received an error message.

---

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**Sent:** Sunday, June 16, 2013 4:07 PM  
**To:** Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
**Cc:** Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
**Subject:** Stip-Harward

Gents,

Harward attached.

v/r  
MAJ Fein

From: Tooman, Joshua J CPT USARMY (US)  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Harward  
Date: Sunday, June 16, 2013 5:49:03 PM  
Attachments: Harward\_Stips.docx

---

Harward comments attached.

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From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 4:07 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: Stip-Harward

Gents,

Harward attached.

v/r  
MAJ Fein

From: Tooman, Joshua J CPT USARMY (US)  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson  
Date: Sunday, June 16, 2013 5:35:55 PM

---

Roger.

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From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 5:33 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson

Josh,

No issues with the sitp. Please accept all changes for tomorrow. PE 11 is DN 73-10, Item 1, which is already admitted and contains the forensic image of the Bigelow computer. The other PE \_ for 1D will be filled in tomorrow when we conduct the layout for PFC Manning to review.

v/r  
MAJ Fein

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 16, 2013 5:31 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson

Tweaked #15. See attached. Noticed that you all added some PE #s, but not others. Was that intentional?

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 5:26 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson

Gents,

Williamson attached. We accepted all your changes and made a few edits.

v/r  
MAJ Fein

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 16, 2013 4:50 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson

Williamson with our comments.

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 4:43 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson

Gents,

If there are no issues with Williamson, please don't sign yet. We are going to send a different version shortly, that includes the PE# for the actual evidence and other identifying information.

Thank you.

v/r  
MAJ Fein

-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 4:01 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: Stip-Williamson

Gents,

Williamson attached.

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 16, 2013 2:38 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips- Bigelow

Sir,

Here is the Bigelow stip that we would sign.

Thanks,

CPT Tooman

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 2:06 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: Stips- Bigelow

Gents,

Attached is the Bigelow Stip.

v/r  
Ashden

From: Fein, Ashden MAJ USARMY MDW (US)  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Bcc: Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Garskardon, Amy E CIV (US)  
Subject: RE: Stip-Williamson  
Date: Sunday, June 16, 2013 5:33:00 PM

---

Josh,

No issues with the sitp. Please accept all changes for tomorrow. PE 11 is DN 73-10, Item 1, which is already admitted and contains the forensic image of the Bigelow computer. The other PE \_ for 1D will be filled in tomorrow when we conduct the layout for PFC Manning to review.

v/r  
MAJ Fein

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 16, 2013 5:31 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson

Tweaked #15. See attached. Noticed that you all added some PE #s, but not others. Was that intentional?

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 5:26 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson

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Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson

Williamson with our comments.

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From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 4:43 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson

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Thank you.

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MAJ Fein

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To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: Stip-Williamson

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Williamson attached.

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From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 16, 2013 2:38 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip- Bigelow

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Thanks,

CPT Tooman

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From: Fein, Ashden MAJ USARMY MDW (US)

Sent: Sunday, June 16, 2013 2:06 PM

To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)

Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);

Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)

CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,

Derek D SGT USARMY USAMDW (US)

Subject: Stips- Bigelow

Gents,

Attached is the Bigelow Stip.

v/r

Ashden

From: Tooman, Joshua J CPT USARMY (US)  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson  
Date: Sunday, June 16, 2013 5:31:25 PM  
Attachments: Williamson\_Stip.docx

---

Tweaked #15. See attached. Noticed that you all added some PE #s, but not others. Was that intentional?

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 5:26 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson

Gents,

Williamson attached. We accepted all your changes and made a few edits.

v/r  
MAJ Fein

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 16, 2013 4:50 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson

Williamson with our comments.

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 4:43 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson

Gents,

If there are no issues with Williamson, please don't sign yet. We are going to send a different version shortly, that includes the PE# for the actual evidence and other identifying information.

Thank you.

v/r  
MAJ Fein

-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 4:01 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: Stip-Williamson

Gents,

Williamson attached.

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 16, 2013 2:38 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips- Bigelow

Sir,

Here is the Bigelow stip that we would sign.

Thanks,

CPT Tooman

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 2:06 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)

Subject: Stips- Bigelow

Gents,

Attached is the Bigelow Stip.

v/r  
Ashden

From: Fein, Ashden MAJ USARMY MDW (US)  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Bcc: Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Garskaddon, Amy E CIV (US)  
Subject: RE: Stip-Williamson  
Date: Sunday, June 16, 2013 5:26:00 PM  
Attachments: 130616 (1712)-Stipulation of Expected Testimony (WilliamsonA).docx

---

Gents,

Williamson attached. We accepted all your changes and made a few edits.

v/r  
MAJ Fein

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 16, 2013 4:50 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson

Williamson with our comments.

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 4:43 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson

Gents,

If there are no issues with Williamson, please don't sign yet. We are going to send a different version shortly, that includes the PE# for the actual evidence and other identifying information.

Thank you.

v/r  
MAJ Fein

-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 4:01 PM

To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);  
Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)  
CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,  
Derek D SGT USARMY USAMDW (US)  
Subject: Stip-Williamson

Gents,

Williamson attached.

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 16, 2013 2:38 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);  
Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)  
CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,  
Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips- Bigelow

Sir,

Here is the Bigelow stip that we would sign.

Thanks,

CPT Tooman

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 2:06 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);  
Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)  
CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,  
Derek D SGT USARMY USAMDW (US)  
Subject: Stips- Bigelow

Gents,

Attached is the Bigelow Stip.

v/r  
Ashden

From: Tooman, Joshua J CPT USARMY (US)  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Downey  
Date: Sunday, June 16, 2013 5:10:46 PM

---

Downey is good to go. We'll print and have the client sign tomorrow.

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 4:12 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: Stip-Downey

Gents,

Downey attached.

v/r  
MAJ Fein



From: Fein, Ashden MAJ USARMY MDW (US)  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson  
Date: Sunday, June 16, 2013 4:54:00 PM

---

Gents,

Thanks. We are verifying and should have out the door in the next 10-15 minutes.

v/r  
MAJ Fein

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 16, 2013 4:50 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson

Williamson with our comments.

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 4:43 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson

Gents,

If there are no issues with Williamson, please don't sign yet. We are going to send a different version shortly, that includes the PE# for the actual evidence and other identifying information.

Thank you.

v/r  
MAJ Fein

-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 4:01 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);

Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)  
CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,  
Derek D SGT USARMY USAMDW (US)  
Subject: Stip-Williamson

Gents,

Williamson attached.

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)

Sent: Sunday, June 16, 2013 2:38 PM

To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)

Cc: Bennett, Jessie D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);

Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)

CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,

Derek D SGT USARMY USAMDW (US)

Subject: RE: Stips- Bigelow

Sir,

Here is the Bigelow stip that we would sign.

Thanks,

CPT Tooman

---

From: Fein, Ashden MAJ USARMY MDW (US)

Sent: Sunday, June 16, 2013 2:06 PM

To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)

Cc: Bennett, Jessie D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);

Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)

CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,

Derek D SGT USARMY USAMDW (US)

Subject: Stips- Bigelow

Gents,

Attached is the Bigelow Stip.

v/r

Ashden

From: Tooman, Joshua J CPT USARMY (US)  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson  
Date: Sunday, June 16, 2013 4:50:16 PM  
Attachments: Williamson Stip.docx

---

Williamson with our comments.

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 4:43 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stip-Williamson

Gents,

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Thank you.

v/r  
MAJ Fein

-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 4:01 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: Stip-Williamson

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Williamson attached.

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 16, 2013 2:38 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,

Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips- Bigelow

Sir,

Here is the Bigelow stip that we would sign.

Thanks,

CPT Tooman

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 2:06 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);  
Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alce)  
CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,  
Derek D SGT USARMY USAMDW (US)  
Subject: Stips- Bigelow

Gents,

Attached is the Bigelow Stip.

v/r  
Ashden

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
**Cc:** Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
**Bcc:** Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy F CIV (US)  
**Subject:** RE: Stip-Williamson  
**Date:** Sunday, June 16, 2013 4:43:00 PM

---

Gents,

If there are no issues with Williamson, please don't sign yet. We are going to send a different version shortly, that includes the PE# for the actual evidence and other identifying information.

Thank you.

v/r  
MAJ Fein

-----Original Message-----

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**Sent:** Sunday, June 16, 2013 4:01 PM  
**To:** Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
**Cc:** Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
**Subject:** Stip-Williamson

Gents,

Williamson attached.

-----Original Message-----

**From:** Tooman, Joshua J CPT USARMY (US)  
**Sent:** Sunday, June 16, 2013 2:38 PM  
**To:** Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
**Cc:** Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
**Subject:** RE: Stips- Bigelow

Sir,

Here is the Bigelow stip that we would sign.

Thanks,

CPT Tooman

---

From: Fein, Ashden MAJ USARMY MDW (US)

Sent: Sunday, June 16, 2013 2:06 PM

To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)

Cc: Bennett, Jessie D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);

Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)

CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark,

Derek D SGT USARMY USAMDW (US)

Subject: Stips- Bigelow

Gents,

Attached is the Bigelow Stip.

v/r

Ashden

From: Tooman, Joshua J CPT USARMY (US)  
To: Overgaard, Angel M CPT USARMY (US); Hurley, Thomas F MAJ USARMY (US)  
Cc: Fein, Ashden MAJ USARMY MDW (US); David E. Coombs; Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Subject: RE: Stips (UNCLASSIFIED)  
Date: Sunday, June 16, 2013 4:39:06 PM

---

Angel

MAJ H agrees with you that things could be wrapped up into 107 or we could supplement with short stips on 23 or 63. No preference here.

v/r

Josh

---

From: Overgaard, Angel M CPT USARMY (US)  
Sent: Sunday, June 16, 2013 2:38 PM  
To: Hurley, Thomas F MAJ USARMY (US)  
Cc: Fein, Ashden MAJ USARMY MDW (US); David E. Coombs; Tooman, Joshua J CPT USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Subject: Stips (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

Sir,

I think that you have a point about 107, 23, and 63. There are a few things that are missing, but we could probably either wrap it all up in the 107 stip or do a quick stip for 23 or 63. Thoughts?

VR

ANGEL M. OVERGAARD

CPT, JA

Trial Counsel, MDW

Fort McNair, DC

(202) 685-2051/1975

Classification: UNCLASSIFIED  
Caveats: NONE



**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
**Cc:** Bennett, Jessie D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
**Subject:** Stip-Bigelow  
**Date:** Sunday, June 16, 2013 4:31:00 PM  
**Attachments:** 130616 (1632)-Stipulation of Expected Testimony (BigelowP).docx

---

Gents,

Bigelow attached. We accepted all your changes and made a few accuracy edits.

v/r  
MAJ Fein

-----Original Message-----

**From:** Tooman, Joshua J CPT USARMY (US)  
**Sent:** Sunday, June 16, 2013 2:38 PM  
**To:** Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
**Cc:** Bennett, Jessie D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
**Subject:** RE: Stips- Bigelow

Sir,

Here is the Bigelow stip that we would sign.

Thanks,

CPT Tooman

---

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**Sent:** Sunday, June 16, 2013 2:06 PM  
**To:** David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
**Cc:** Bennett, Jessie D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
**Subject:** Stips- Bigelow

Gents,

Attached is the Bigelow Stip.

v/r  
Ashden

From: Fein, Ashden MAJ USARMY MDW (US)  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: Stip-Downey  
Date: Sunday, June 16, 2013 4:12:00 PM  
Attachments: 130616 (1611)-Stipulation of Expected Testimony (Downey).docx

---

Gents,

Downey attached.

v/r  
MAJ Fein

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
**Cc:** Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
**Bcc:** Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Garskaddon, Amy E CIV (US)  
**Subject:** Stip-Harward  
**Date:** Sunday, June 16, 2013 4:07:00 PM  
**Attachments:** 130616 (1605)-Stipulation of Expected Testimony (HarwardR).docx

---

Gents,

Harward attached.

v/r  
MAJ Fein

From: Fein, Ashden MAJ USARMY MDW (US)  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: Stip-Williamson  
Date: Sunday, June 16, 2013 4:01:00 PM  
Attachments: 130616 (1554)-Stipulation of Expected Testimony (WilliamsonA).docx

---

Gents,

Williamson attached.

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 16, 2013 2:38 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips- Bigelow

Sir,

Here is the Bigelow stip that we would sign.

Thanks,

CPT Tooman

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 2:06 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: Stips- Bigelow

Gents,

Attached is the Bigelow Stip.

v/r  
Ashden



From: Tooman, Joshua J CPT USARMY (US)  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs, Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips- Bigelow  
Date: Sunday, June 16, 2013 2:37:46 PM  
Attachments: SSG Bigelow.docx

---

Sir,

Here is the Bigelow stip that we would sign.

Thanks,

CPT Tooman

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 2:06 PM  
To: David Coombs, Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: Stips- Bigelow

Gents,

Attached is the Bigelow Stip.

v/r  
Ashden

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
**Cc:** Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derok D SGT USARMY USAMDW (US)  
**Bcc:** Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy E CIV (US)  
**Subject:** Stips- Bigelow  
**Date:** Sunday, June 16, 2013 2:06:00 PM  
**Attachments:** 130616 (1400)-Stipulation of Expected Testimony (BigelowP).docx

---

Gents,

Attached is the Bigelow Stip.

v/r  
Ashden



From: David Coombs  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips Update  
Date: Sunday, June 16, 2013 12:16:58 PM

---

Ashden,

We would need to know when and why in 2013 the NCD was pulled off of JWICS if that is the case. I could imagine that it was pulled simply because of funding considerations. If this is the case, we would need to state that this has nothing to do with the charged conduct of PFC Manning, and we would also need to state that the same information is now available on other reporting databases or channels.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
coombs@armycourt martialdefense.com  
www.armycourt martialdefense.com

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fein.mil@mail.mil>]  
Sent: Sunday, June 16, 2013 12:10 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips Update

David,

I understand. I think the confusion is set on whether the cables themselves are available through other reporting, vice through NCD. NCD was severed

and no longer exists. We will find someone on our witness list who could let you know that. The cables themselves are still and have remained available through other legacy systems, as AMB Kennedy's testimony stated. We are not disputing that the cables remain available to the Department of State employees and others in the USG through legacy systems, just that they do not remain available on NCD because NCD no longer exists on any network.

v/r  
Ashden

-----Original Message-----

From: David Coombs [mailto:[coombs@armycourtartialdefense.com](mailto:coombs@armycourtartialdefense.com)]  
Sent: Sunday, June 16, 2013 12:07 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips Update

Ashden,

We would need to speak with someone with knowledge regarding whether the NCD was severed from JWICS during 2013 and whether it is currently available through other reporting channels in order to agree with any change. Additionally, assuming that the NCD is not on JWICS or other reporting channels, we would need to include the reasoning for this late change and whether reporting is now accomplished in some other manner.

As for the statements of the witnesses, if the witnesses' testimony is now different from what they have previously told us, you would need to bring them so that we can cross them on their previous statements.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
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[coombs@armycourtartialdefense.com](mailto:coombs@armycourtartialdefense.com)  
[www.armycourtartialdefense.com](http://www.armycourtartialdefense.com)

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fein.mil@mail.mil>]  
Sent: Sunday, June 16, 2013 12:00 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alcec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips Update

David,

Ambassador Kennedy's testimony was more than 2 years ago. Since then, NCD was removed from JWICS during the first half of 2013. It was removed from SIPRNET before that, and the global usage on SIPRNET was severed after Thanksgiving 2010. As for the statement, we are verifying with the witnesses. If they do not agree, we will call them as witnesses as per your email. Assuming they don't agree, would the defense like to have a conference call with each one and ask the question to them in order to be comfortable stipulating?

I will let you know the outcome of our phone call with them, once we connect.

v/r  
Ashden

-----Original Message-----

From: David Coombs [<mailto:coombs@armycourtmarshalfense.com>]  
Sent: Sunday, June 16, 2013 11:53 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alcec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips Update

Ashden,

The NCD database still exists on JWICS and other distribution channels according to the congressional testimony of AMB Kennedy, and our discussions with DOS witnesses. We would not agree to referring to NCD in the past tense. Additionally, the witnesses would say that there was no express or implied restriction on the manner of downloading of the cables. Unless these facts are a part of the stipulation, we would not agree to stipulate to their testimony.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906

Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
coombs@armycourtartialdefense.com  
www.armycourtartialdefense.com

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [mailto:ashden.fein.mil@mail.mil]  
Sent: Sunday, June 16, 2013 11:43 AM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips Update

David,

We reviewed the Johnson and Wisecarver stips. We changed all references to NCD to the past tense because NCD no longer exists. I explained to MAJ Hurley a little bit ago, that NCD was terminated on all networks, therefore any references need to be in the past, or "as of the date of compromise or shortly thereafter."

Overall, we have no issues with the edits; however we have to check on the one line about "express or implied prohibition" with the witnesses. We do not believe they would testify to that fact, and would actually testify to the contrary. Hopefully we will be able to get a hold of them today to verify that fact. If they agree, we will send back the final version with past tense added back in. If they disagree, we will capture their summary the best we can and send it back to you.

v/r  
Ashden

-----Original Message-----

From: David Coombs [mailto:coombs@armycourtartialdefense.com]  
Sent: Saturday, June 15, 2013 11:09 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips Update

Ashden,

We have made additional changes to the Mr. Wisecarver and Dr. Johnson's stip. Please see the attached document. If the Government does not agree with these additional changes, it will be necessary to bring Mr. Wisecarver and Dr. Johnson as witnesses.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [mailto:ashden.fein.mil@mail.mil]  
Sent: Friday, June 14, 2013 6:21 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: Stips Update

Gents,

We have the classified computer ready to sign over tomorrow morning after 1030. SGT Clark is the POC and will be in the trailer. Below is an update on all stips we are tracking.

1. Pearce-on computer
2. Yamamoto-on computer
3. Yun-on computer
4. Moore-on computer
5. Yavonovitch-on computer
6. Pittman-on computer
7. #107-on computer
8. Janek-waiting to hear back from him
9. Mundy-waiting to hear back from him
10. Seche-still drafting (estimate Sunday delivery)
11. Feeley-still drafting (estimate Sunday delivery)
12. Woods-defense
13. Motes-defense
14. Johnson-will edit and verify this weekend
15. Wisecarver-will edit and

verify this weekend 16. Thian-agreed upon and with defense 17. Strobl-agreed upon and with government for printing because classified 18. Allen-agreed upon and with defense 19. Murphy-with DoS for technical review 20. Downey-still drafting (estimate Sunday delivery by 1400) 21. Harward-still drafting (estimate Sunday delivery by 1400) 22. Aboul-Encin-still drafting (estimate Sunday delivery by 1400) 23. Williamson-still drafting (estimate Sunday delivery by 1400) 24. Bigelow-still drafting (estimate Sunday delivery by 1400)

From: David Coombs  
To: Fein, Ashden MAJ USARMY MDW (US)  
Subject: RE: Stips Update  
Date: Sunday, June 16, 2013 12:16:23 PM

---

Ashden,

We would need to know when and why in 2013 the NCD was pulled off of JWICS if that is the case. I could imagine that it was pulled simply because of funding considerations. If this is the case, we would need to state that this has nothing to do with the charged conduct of PFC Manning, and we would also need to state that the same information is now available on other reporting databases or channels.

Best,  
David

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fein.mil@mail.mil>]  
Sent: Sunday, June 16, 2013 12:10 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips Update

David,

I understand. I think the confusion is set on whether the cables themselves are available through other reporting, vice through NCD. NCD was severed and no longer exists. We will find someone on our witness list who could let you know that. The cables themselves are still and have remained available through other legacy systems, as AMB Kennedy's testimony stated. We are not disputing that the cables remain available to the Department of

State employees and others in the USG through legacy systems, just that they do not remain available on NCD because NCD no longer exists on any network.

v/r  
Ashden

-----Original Message-----

From: David Coombs [mailto:coombs@armycourtmartrialdefense.com]  
Sent: Sunday, June 16, 2013 12:07 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessie D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips Update

Ashden,

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As for the statements of the witnesses, if the witnesses' testimony is now different from what they have previously told us, you would need to bring them so that we can cross them on their previous statements.

Best,  
David

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [mailto:ashden.fein.mil@mail.mil]  
Sent: Sunday, June 16, 2013 12:00 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)



Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips Update

David,

Ambassador Kennedy's testimony was more than 2 years ago. Since then, NCD was removed from JWICS during the first half of 2013. It was removed from SIPRNET before that, and the global usage on SIPRNET was severed after Thanksgiving 2010. As for the statement, we are verifying with the witnesses. If they do not agree, we will call them as witnesses as per your email. Assuming they don't agree, would the defense like to have a conference call with each one and ask the question to them in order to be comfortable stipulating?

I will let you know the outcome of our phone call with them, once we connect.

v/r  
Ashden

-----Original Message-----

From: David Coombs [<mailto:coombs@armycourtartialdefense.com>]  
Sent: Sunday, June 16, 2013 11:53 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips Update

Ashden,

The NCD database still exists on JWICS and other distribution channels according to the congressional testimony of AMB Kennedy, and our discussions with DOS witnesses. We would not agree to referring to NCD in the past tense. Additionally, the witnesses would say that there was no express or implied restriction on the manner of downloading of the cables. Unless these facts are a part of the stipulation, we would not agree to stipulate to their testimony.

Best,  
David

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Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
[coombs@armycourtartialdefense.com](mailto:coombs@armycourtartialdefense.com)

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fein.mil@mail.mil>]  
Sent: Sunday, June 16, 2013 11:43 AM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips Update

David,

We reviewed the Johnson and Wisecarver stips. We changed all references to NCD to the past tense because NCD no longer exists. I explained to MAJ Hurley a little bit ago, that NCD was terminated on all networks, therefore any references need to be in the past, or "as of the date of compromise or shortly thereafter."

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v/r  
Ashden

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Bcc: Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy E CIV (US)  
Subject: RE: Stips Update  
Date: Sunday, June 16, 2013 12:12:00 PM  
Attachments: 130614 (1538)-Stipulation of Expected Testimony (MotesI) CLEAN.docx  
130612 (0821)-Stipulation of Expected Testimony (AllenM) CLEAN.docx  
130613 (1254)-Stipulation of Expected Testimony (ThianT) (Encl) CLEAN.docx  
130613 (1254)-Stipulation of Expected Testimony (ThianT) CLEAN.docx

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MAJ Hurley,

1. Collins is going to be rolled up in Downey, so we do not expect to call him if there is a signed stipulation for Downey.
2. Motes attached.
3. Thian attached with PE enclosures
4. Allen attached.

More stips to follow throughout the day, including the ones listed below. Also, as per our discussion outside, we will setup all the PEs and other references the stips make for the accused and counsel to review prior to the MJ's colloquy. We will layout the information in a manner similar to Nehring and Hoskins to make it easier for all parties.

v/r  
MAJ Fein

-----Original Message-----

From: Hurley, Thomas F MAJ USARMY (US)  
Sent: Sunday, June 16, 2013 12:01 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips Update

All

Here are the stipulations I believe we can get signed by the client today:

Strobl  
Allen  
Motes  
Woods  
Thian

Collins (this guy is on AE 566 as a witness and potential stip but not on the rundown you sent on Friday - do you still want to call and stip or not going to call at all?)

Downey  
Bigelow  
Williamson

Please forward me clean copies of Allen (I marred the copy I have and can't find the final version in the email exchanges), Motes, Thian. We will work this afternoon on Downey, Bigelow, and Williamson.

Thanks.

MAJ Hurley

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 16, 2013 3:43 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
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Subject: RE: Stips Update  
Date: Sunday, June 16, 2013 12:10:00 PM

---

David,

I understand. I think the confusion is set on whether the cables themselves are available through other reporting, vice through NCD. NCD was severed and no longer exists. We will find someone on our witness list who could let you know that. The cables themselves are still and have remained available through other legacy systems, as AMB Kennedy's testimony stated. We are not disputing that the cables remain available to the Department of State employees and others in the USG through legacy systems, just that they do not remain available on NCD because NCD no longer exists on any network.

v/r  
Ashden

-----Original Message-----

From: David Coombs [mailto:[coombs@armycourtmarialdefense.com](mailto:coombs@armycourtmarialdefense.com)]  
Sent: Sunday, June 16, 2013 12:07 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
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Subject: RE: Stips Update

Ashden,

We would need to speak with someone with knowledge regarding whether the NCD was severed from JWICS during 2013 and whether it is currently available through other reporting channels in order to agree with any change. Additionally, assuming that the NCD is not on JWICS or other reporting channels, we would need to include the reasoning for this late change and whether reporting is now accomplished in some other manner.

As for the statements of the witnesses, if the witnesses' testimony is now different from what they have previously told us, you would need to bring them so that we can cross them on their previous statements.

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Subject: RE: Stips Update

David,

Ambassador Kennedy's testimony was more than 2 years ago. Since then, NCD was removed from JWICS during the first half of 2013. It was removed from SIPRNET before that, and the global usage on SIPRNET was severed after Thanksgiving 2010. As for the statement, we are verifying with the witnesses. If they do not agree, we will call them as witnesses as per your email. Assuming they don't agree, would the defense like to have a conference call with each one and ask the question to them in order to be comfortable stipulating?

I will let you know the outcome of our phone call with them, once we connect.

v/r

Ashden

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Ashden,

The NCD database still exists on JWICS and other distribution channels according to the congressional testimony of AMB Kennedy, and our discussions

with DOS witnesses. We would not agree to referring to NCD in the past tense. Additionally, the witnesses would say that there was no express or implied restriction on the manner of downloading of the cables. Unless these facts are a part of the stipulation, we would not agree to stipulate to their testimony.

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Subject: RE: Stips Update  
Date: Sunday, June 16, 2013 12:06:58 PM

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I will let you know the outcome of our phone call with them, once we connect.

v/r  
Ashden

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From: David Coombs [<mailto:coombs@armycourtartialdefense.com>]  
Sent: Sunday, June 16, 2013 11:53 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
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Subject: RE: Stips Update  
Date: Sunday, June 16, 2013 12:01:21 PM

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All

Here are the stipulations I believe we can get signed by the client today:

Strobl  
Allen  
Motes  
Woods  
Thian

Collins (this guy is on AE 566 as a witness and potential stip but not on the rundown you sent on Friday - do you still want to call and stip or not going to call at all?)

Downey  
Bigelow  
Williamson

Please forward me clean copies of Allen (I marred the copy I have and can't find the final version in the email exchanges), Motes, Thian. We will work this afternoon on Downey, Bigelow, and Williamson.

Thanks.

MAJ Hurley

---

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Bcc: Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy E CIV (US)  
Subject: RE: Stips Update  
Date: Sunday, June 16, 2013 11:59:00 AM

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Subject: RE: Stips Update  
Date: Sunday, June 16, 2013 11:53:16 AM  
Attachments: Kennedy 2.mp4

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**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** "David Coombs"; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
**Cc:** Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
**Bcc:** Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy F CIV (US)  
**Subject:** RE: Stips Update  
**Date:** Sunday, June 16, 2013 11:43:00 AM

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David,

We reviewed the Johnson and Wisecarver stips. We changed all references to NCD to the past tense because NCD no longer exists. I explained to MAJ Hurley a little bit ago, that NCD was terminated on all networks, therefore any references need to be in the past, or "as of the date of compromise or shortly thereafter."

Overall, we have no issues with the edits; however we have to check on the one line about "express or implied prohibition" with the witnesses. We do not believe they would testify to that fact, and would actually testify to the contrary. Hopefully we will be able to get a hold of them today to verify that fact. If they agree, we will send back the final version with past tense added back in. If they disagree, we will capture their summary the best we can and send it back to you.

v/r  
Ashden

-----Original Message-----

**From:** David Coombs <[dcoombs@armycourt martialdefense.com](mailto:dcoombs@armycourt martialdefense.com)>

**Sent:** Saturday, June 15, 2013 11:09 AM

**To:** Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)

**Cc:** Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)

**Subject:** RE: Stips Update

Ashden,

We have made additional changes to the Mr. Wisecarver and Dr. Johnson's stip. Please see the attached document. If the Government does not agree with these additional changes, it will be necessary to bring Mr. Wisecarver and Dr. Johnson as witnesses.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
[dcoombs@armycourt martialdefense.com](mailto:dcoombs@armycourt martialdefense.com)  
[www.armycourt martialdefense.com](http://www.armycourt martialdefense.com)

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fein.mil@mail.mil>]

Sent: Friday, June 14, 2013 6:21 PM

To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)

Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)

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Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: Re: Stips Update  
Date: Saturday, June 15, 2013 11:52:13 AM

---

Thank you. We will review and get back to you.

----- Original Message -----

From: David Coombs [mailto:coombs@armycourt martialdefense.com]  
Sent: Saturday, June 15, 2013 11:08 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
Subject: RE: Stips Update

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Sent: Friday, June 14, 2013 6:21 PM  
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Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY

USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alce) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US)  
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From: Fein, Ashden MAJ USARMY MDW (US)  
To: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US);  
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Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alce) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: Re: Stips  
Date: Saturday, June 15, 2013 11:52:12 AM

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Thank you.

----- Original Message -----

From: Hurley, Thomas F MAJ USARMY (US)  
Sent: Saturday, June 15, 2013 11:42 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs <coombs@armycourtartialdefense.com>  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alce) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stips

MAJ Fein

The Motes stip is good.

v/r  
tth

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Friday, June 14, 2013 7:39 PM  
To: Tooman, Joshua J CPT USARMY (US); Hurley, Thomas F MAJ USARMY (US); David Coombs  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alce) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stips

Gents,

Attached is our iteration with tracked changes for Motes. We spoke to him today to get the clarification on the parts you added.

v/r  
MAJ Fein

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From: Tooman, Joshua J CPT USARMY (US)  
Sent: Friday, June 14, 2013 3:15 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); David Coombs  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alce) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stips

Sir



You'd previously asked if we are willing to stip to Bigelow, Williamson, and CDR Aboul-Encin. The answer is yes.

Josh

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From: Fein, Ashden MAJ USARMY MDW (US)

Sent: Thursday, June 13, 2013 7:36 PM

To: Hurley, Thomas F MAJ USARMY (US); David Coombs; Tooman, Joshua J CPT USARMY (US)

Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);

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Subject: RE: Stips  
Date: Saturday, June 15, 2013 11:42:05 AM

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MAJ Fein

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v/r  
tlf

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Subject: RE: Stips Update  
Date: Saturday, June 15, 2013 11:09:06 AM  
Attachments: Wisecarver\_Stip.docx  
Johnson\_Stip.docx

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**Subject:** Stips Update  
**Date:** Friday, June 14, 2013 6:21:00 PM

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**Subject:** RE: Stips  
**Date:** Friday, June 14, 2013 3:39:00 PM  
**Attachments:** 130614 (1538)-Stipulation of Expected Testimony (Motes).docx

---

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v/r  
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Our plan is to still have us agree on State stips and then after the defense and accused sign them, we will send them to the Department for clearance; however I am sending Mr. Murphy's first to them, because it is very technical when it comes to classification and I think it would be a waste of our time to go back and forth on it, if needed, before he gets a copy. I am sending that one to the Department tonight.

v/r  
Ashden



**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** Tooman, Joshua J CPT USARMY (US); Hurley, Thomas F MAJ USARMY (US); David Coombs  
**Cc:** Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel  
M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US);  
Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Subject:** RE: Stips  
**Date:** Friday, June 14, 2013 3:17:00 PM

---

Thanks. We will have them ready by Sunday. I will send a roll-up of what we have in a few hours. We will have a classified laptop to hand to ya'll tomorrow with most of all the State Stips ready for review.

-----Original Message-----

**From:** Tooman, Joshua J CPT USARMY (US)  
**Sent:** Friday, June 14, 2013 3:15 PM  
**To:** Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); David Coombs  
**Cc:** Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Subject:** RE: Stips

Sir

You'd previously asked if we are willing to stip to Bigelow, Williamson, and CDR Aboul-Enein. The answer is yes.

Josh

---

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**Sent:** Thursday, June 13, 2013 7:36 PM  
**To:** Hurley, Thomas F MAJ USARMY (US); David Coombs; Tooman, Joshua J CPT USARMY (US)  
**Cc:** Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Subject:** Stips

Gents,

Attached are the following stips:

1. Motes returned. We spoke with him today and obtained some clarity on a few points. Changes are tracked.
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3. Wisecarver

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Ashden

**From:** Tooman, Joshua J CPT USARMY (US)  
**To:** Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); David Coombs  
**Cc:** Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel  
M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US);  
Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Subject:** RE: Stips  
**Date:** Friday, June 14, 2013 3:16:03 PM

---

Sir

You'd previously asked if we are willing to stip to Bigelow, Williamson, and CDR Aboul-Enein. The answer is yes.

Josh

---

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**Sent:** Thursday, June 13, 2013 7:36 PM  
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M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US);  
Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stips  
Date: Friday, June 14, 2013 11:26:01 AM  
Attachments: Wisecarver Stip.docx  
Motes Stip.docx  
Johnson Stip.docx

---

All

Attached are the Johnson, Motes, and Wisecarver stips with Defense notes.

Thanks,

Josh

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Thursday, June 13, 2013 7:36 PM  
To: Hurley, Thomas F MAJ USARMY (US); David Coombs; Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);  
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**To:** Hurley, Thomas F MAJ USARMY (US); David Coombs; Tooman, Joshua J CPT USARMY (US)  
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**Bcc:** Clark, Derek D SGT USARMY USAMDW (US); Johns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy E CIV (US)  
**Subject:** Stips  
**Date:** Thursday, June 13, 2013 7:36:00 PM  
**Attachments:** 130613 (1842)-Stipulation of Expected Testimony (JohnsonG).docx  
130613 (1842)-Stipulation of Expected Testimony (WisecarverC).docx  
130613 (1900)-Stipulation of Expected Testimony (MotesJ).docx

---

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Subject: RE: Stips  
Date: Thursday, June 13, 2013 3:15:08 PM  
Attachments: Motes Stipulation with Defense Changes.docx

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All

Here's the Motes stipulation. I really fudged up the 'track changes' function on this one. I highlighted my additions by making them the color red. I also changed a "may" to a "could" in paragraph 17.

Also, could we add the last two paragraphs on the Woods stipulation to this one? One of the paragraphs I hand-wrote and gave back to you today. The other was the last paragraph about some of the CSRTs being released in 2007.

Thanks.

MAJ Hurley

---

From: Hurley, Thomas F MAJ USARMY (US)  
Sent: Thursday, June 13, 2013 6:04 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stips

MAJ Fein

I am fine with the changes to Thian.

v/r

tfh

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Thursday, June 13, 2013 6:01 PM  
To: Hurley, Thomas F MAJ USARMY (US); David Coombs; Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stips

MAJ Hurley,

Thanks. We received your notes and are working on the updates. Wisecarver and Johnson are almost finished and I expect to have those out in the next hour. We are also finalizing Murphy, Harward, Downey, and #107.

Attached is Thian and is updated pursuant to our discussions.

v/r  
MAJ Fein

-----Original Message-----

From: Hurley, Thomas F MAJ USARMY (US)  
Sent: Thursday, June 13, 2013 1:59 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stips

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Motes

I have returned with notes:

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I will ask the client to review:

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Thanks.

MAJ Hurley

---

From: Fein, Ashden MAJ USARMY MDW (US)

Sent: Wednesday, June 12, 2013 12:24 PM

To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)

Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alce) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)

Subject: Stips

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v/r

Ashden



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Subject: RE: Stips  
Date: Thursday, June 13, 2013 2:04:18 PM

---

MAJ Fein

I am fine with the changes to Thian.

v/r

tlfh

---

From: Fein, Ashden MAJ USARMY MDW (US)  
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Subject: RE: Stips

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To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Tooman, Joshua J CPT USARMY (US)  
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Subject: RE: Stips

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CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: Stips

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From: Hurley, Thomas F MAJ USARMY (US)  
To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Fein, Ashden MAJ USARMY MDW (US); David Coombs; Tooman, Joshua J CPT USARMY (US)  
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Subject: RE: Stips (UNCLASSIFIED)  
Date: Thursday, June 13, 2013 2:01:56 PM

---

CPT Morrow

Apologies for the confusion. Please add paragraph 12 and make the old paragraph 12 paragraph 13.

v/r

tlf

---

From: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Sent: Thursday, June 13, 2013 6:00 PM  
To: Hurley, Thomas F MAJ USARMY (US); Fein, Ashden MAJ USARMY MDW (US); David Coombs; Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stips (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

MAJ Hurley,

I'm confused by your notes on RDML Woods. Would you like paragraph 12 to replace the old paragraph 12 or to supplement?

CPT Joe Morrow  
Trial Counsel  
U.S. Army Military District of Washington  
Phone: 202-685-1975  
NIPR: jodean.morrow.mil@mail.mil  
SIPR: jodean.morrow@jfhqncr.northcom.smil.mil

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Sent: Thursday, June 13, 2013 1:59 PM  
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(US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F  
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Classification: UNCLASSIFIED  
Caveats: NONE

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**Subject:** RE: Stips  
**Date:** Thursday, June 13, 2013 2:00:00 PM  
**Attachments:** 130613 (1254)-Stipulation of Expected Testimony (Thian1).docx  
130613 (1254)-Stipulation of Expected Testimony (Thian1) (Encl.).docx

---

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Thanks. We received your notes and are working on the updates. Wisecarver and Johnson are almost finished and I expect to have those out in the next hour. We are also finalizing Murphy, Harward, Downey, and #107.

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Ashden



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Subject: RE: Stips  
Date: Thursday, June 13, 2013 1:58:40 PM

---

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**Bcc:** Clark, Derek D SGT USARMY USAMDW (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy E CIV (US)  
**Subject:** Stips  
**Date:** Wednesday, June 12, 2013 8:24:00 AM  
**Attachments:** 130612 (0752)-Stipulation of Expected Testimony (Motes).docx  
130612 (0821)-Stipulation of Expected Testimony (AllenM).docx

---

Gents,

Attached are Motes and Allen. We also have Strobl, Mundy, and Janak that are classified for your review. Johnson and Wisecarver should be ready by lunch.

v/r  
Ashden

From: Hurley, Thomas F MAJ USARMY (US)  
To: von Elten, Alexander S (Alec) CPT USARMY (US)  
Cc: David Coombs; Tooman, Joshua J CPT USARMY (US); Fein, Ashden MAJ USARMY MDW (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips (UNCLASSIFIED)  
Date: Monday, June 10, 2013 1:52:34 PM  
Attachments: Larue with Defense Changes.docx

---

All

Here are the changes on the Larue stipulation.

v/r  
tth

---

From: von Elten, Alexander S (Alec) CPT USARMY (US)  
Sent: Monday, June 10, 2013 5:29 PM  
To: Hurley, Thomas F MAJ USARMY (US)  
Cc: David Coombs; Tooman, Joshua J CPT USARMY (US); Fein, Ashden MAJ USARMY MDW (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

Sir,

It's attached.

Respectfully,

Alec von Elten

-----Original Message-----

From: Hurley, Thomas F MAJ USARMY (US)  
Sent: Monday, June 10, 2013 1:27 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

MAJ Fein

Can you send me the SoET for CW5 Larue?

Thanks.

MAJ Hurley

---

From: Fein, Ashden MAJ USARMY MDW (US)

Sent: Monday, June 10, 2013 12:11 PM

To: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US);  
Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F  
CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessice D SSG USARMY (US)  
Subject: RE: Stips

Gents,

Grant's is attached. We added the PE for ID language.

v/r  
MAJ Fein

-----Original Message-----

From: Hurley, Thomas F MAJ USARMY (US)

Sent: Monday, June 10, 2013 7:14 AM

To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte,  
J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT  
USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessice D SSG USARMY (US)  
Subject: RE: Stips

MAJ Fein

Some help would be great. I have no problem cold calling RADL Woods, but I think my identity and relationship to this case would have to be verified by someone.

Thanks.

MAJ Hurley

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From: Fein, Ashden MAJ USARMY MDW (US)

Sent: Monday, June 10, 2013 2:35 AM

To: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
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USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessice D SSG USARMY (US)  
Subject: RE: Stips

MAJ Hurley,

I know I just sent the Stip back to you for review. If you would like us to assist with setting up a phone call, we will start first thing tomorrow morning.

v/r  
MAJ Fein

-----Original Message-----

From: Hurley, Thomas F MAJ USARMY (US)  
Sent: Sunday, June 09, 2013 6:31 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte,  
J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT  
USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

MAJ Fein

One stip we haven't said much about is RADL Woods. I would like to have him validate the stipulation and describe - in greater detail - his process of review. Do you have a good phone number for his aide? I anticipate that this will take a couple of days to knock out through email or a phone call.

Thanks.

MAJ Hurley

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From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 09, 2013 9:50 PM  
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J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT  
USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

MAJ Hurley,

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MAJ Fein

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Sent: Sunday, June 09, 2013 5:46 PM  
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USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

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Thanks.

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Sent: Sunday, June 09, 2013 9:12 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

Gents,

We also sent Grant and did not hear back.

Overall, you should still be getting back to us on Grant, Nehring, and Hoskins.\ Thanks!

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 09, 2013 3:01 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

Sir

Attached are seven stips for which we request some modifications. We'll bring the other, signed copies over shortly.

Thanks,

Josh

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From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 09, 2013 12:30 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte,

J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

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Sent: Sunday, June 09, 2013 12:30 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
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Subject: RE: Stips

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Subject: RE: Stips

David,

Thank you. We will review and send back. Are you still reviewing the remainder or are those fine? Also what about the others that we added below?

v/r  
Ashden

-----Original Message-----

From: David Coombs [<mailto:coombs@armycourtmarshaldefense.com>]  
Sent: Sunday, June 09, 2013 8:52 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

Ashden,

Here are the changes for Debra Van Alstyne. Let me know if you have issues.



If not, we will have this signed and sent to you this afternoon.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
coombs@armycourt martialdefense.com  
www.armycourt martialdefense.com <<http://www.armycourt martialdefense.com/>>  
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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fein.mil@mail.mil>]  
Sent: Saturday, June 08, 2013 8:03 PM  
To: David Coombs (coombs@armycourt martialdefense.com); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: Stips

Gents,

Attached are 12 stipulations. Tomorrow early afternoon we will send others and make classified ones available via a classified laptop, so that you can track changes, if needed.

We did not fill in PE numbers on here yet, because it would be best for you to review and let us know if there are issues.

Also, after reviewing the remainder of the witnesses, is the defense willing to stipulate to Glenn, Wisecarver, JohnsonG, and Larue?

Thanks!

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Classification: UNCLASSIFIED  
Caveats: NONE

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To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
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Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips  
Date: Monday, June 10, 2013 1:26:56 PM

---

MAJ Fein

Can you send me the SoET for CW5 Larue?

Thanks.

MAJ Hurley

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Monday, June 10, 2013 12:11 PM  
To: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
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Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F  
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Grant's is attached. We added the PE for ID language.

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USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
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Ashden

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Subject: RE: Stips

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Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
coombs@armycourtartialdefense.com  
www.armycourtartialdefense.com <<http://www.armycourtartialdefense.com/>>  
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Also, after reviewing the remainder of the witnesses, is the defense willing to stipulate to Glenn, Wisecarver, JohnsonG, and Larue?

Thanks!

v/r  
Ashden

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
**Cc:** Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter  
CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US);  
Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
**Bcc:** Clark, Derek D SGT USARMY USAMDW (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY  
MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy F CIV (US)  
**Subject:** RE: Stips  
**Date:** Monday, June 10, 2013 8:11:00 AM  
**Attachments:** 130610 (0811)-Stipulation of Expected Testimony (GrantU).docx

---

Gents,

Grant's is attached. We added the PE for ID language.

v/r  
MAJ Fein

-----Original Message-----

**From:** Hurley, Thomas F MAJ USARMY (US)  
**Sent:** Monday, June 10, 2013 7:14 AM  
**To:** Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
**Cc:** Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
**Subject:** RE: Stips

MAJ Fein

Some help would be great. I have no problem cold calling RADL Woods, but I think my identity and relationship to this case would have to be verified by someone.

Thanks.

MAJ Hurley

---

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**Sent:** Monday, June 10, 2013 2:35 AM  
**To:** Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
**Cc:** Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
**Subject:** RE: Stips

MAJ Hurley,

I know I just sent the Stip back to you for review. If you would like us to assist with setting up a phone call, we will



start first thing tomorrow morning.

v/r  
MAJ Fein

-----Original Message-----

From: Hurley, Thomas F MAJ USARMY (US)  
Sent: Sunday, June 09, 2013 6:31 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

MAJ Fein

One stip we haven't said much about is RADL Woods. I would like to have him validate the stipulation and describe - in greater detail - his process of review. Do you have a good phone number for his aide? I anticipate that this will take a couple of days to knock out through email or a phone call.

Thanks.

MAJ Hurley

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 09, 2013 9:50 PM  
To: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

MAJ Hurley,

That sounds like a good plan that we can work out tomorrow.

MAJ Fein

-----Original Message-----

From: Hurley, Thomas F MAJ USARMY (US)  
Sent: Sunday, June 09, 2013 5:46 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

MAJ Fein

Here are the changes for Nehring. Is there a way that we can review all of the material (including the PEs) over lunch in order to avoid thumbing through hundreds of documents while everyone stares at us? My reading comprehension plummets under those conditions.

Thanks.

MAJ Hurley

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 09, 2013 9:12 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessice D SSG USARMY (US)  
Subject: RE: Stips

Gents,

We also sent Grant and did not hear back.

Overall, you should still be getting back to us on Grant, Nehring, and Hoskins.\  
Thanks!

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 09, 2013 3:01 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessice D SSG USARMY (US)  
Subject: RE: Stips

Sir

Attached are seven stips for which we request some modifications. We'll bring the other, signed copies over shortly.

Thanks,

Josh

---

From: Fein, Ashden MAJ USARMY MDW (US)

Sent: Sunday, June 09, 2013 12:30 PM

To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

Thanks.

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)

Sent: Sunday, June 09, 2013 12:30 PM

To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

Sir

We'll get you our changes to the others shortly for your review. We'll discuss the additional names and let you know this afternoon.

---

From: Fein, Ashden MAJ USARMY MDW (US)

Sent: Sunday, June 09, 2013 12:27 PM

To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

David,

Thank you. We will review and send back. Are you still reviewing the remainder or are those fine? Also what about the others that we added below?

v/r

Ashden

-----Original Message-----

From: David Coombs [<mailto:coombs@armycourtmarshalfdefense.com>]

Sent: Sunday, June 09, 2013 8:52 AM

To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)

Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)

Subject: RE: Stips

Ashden,

Here are the changes for Debra Van Alstyne. Let me know if you have issues. If not, we will have this signed and sent to you this afternoon.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
coombs@armycourt martialdefense.com  
www.armycourt martialdefense.com <<http://www.armycourt martialdefense.com/>>  
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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fein.mil@mail.mil>]  
Sent: Saturday, June 08, 2013 8:03 PM  
To: David Coombs (coombs@armycourt martialdefense.com); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: Stips

Gents,

Attached are 12 stipulations. Tomorrow early afternoon we will send others and make classified ones available via a classified laptop, so that you can track changes, if needed.

We did not fill in PE numbers on here yet, because it would be best for you to review and let us know if there are issues.

Also, after reviewing the remainder of the witnesses, is the defense willing to stipulate to Glenn, Wisecarver, JohnsonG, and Larue?

Thanks!

v/r  
Ashden



From: Fein, Ashden MAJ USARMY MDW (US)  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Bcc: Clark, Derek D SGT USARMY USAMDW (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy F CIV (US)  
Subject: RE: Stipulations  
Date: Monday, June 10, 2013 7:48:00 AM  
Attachments: 130610 (0747)-Stipulation of Expected Testimony (BoraW).docx

---

David,

No issues with Bora. I accepted all the changes and its attached. We will review Woods and setup the phone meeting.

v/r  
Ashden

-----Original Message-----

From: David Coombs [<mailto:coombs@armycourtartialdefense.com>]  
Sent: Monday, June 10, 2013 6:59 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stipulations

Ashden,

I am verifying the changes you made on Ms. Van-Alstyne's stipulation. Once I hear back from her, I will let you know. With regards to the other changes we will do the following:

Woods: I have attached an additional change based upon your addition. I have also attached the supporting document for that change.

Bora: We accepted all changes and made one minor change for clarity.

Hoeffel: Changes accepted.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
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[www.armycourtartialdefense.com](http://www.armycourtartialdefense.com)

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fein.mil@mail.mil>]

Sent: Sunday, June 09, 2013 10:33 PM

To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)

Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: Stipulations

Gents,

Attached are the below stipulations, Round #2. We have not finalized Hoskins, but will first thing tomorrow morning.

White- all accepted.

Thian- all accepted. Once it gets signed by the defense tomorrow, we will immediately send to DoS for final review by Ms. Thian.

Bora- edits tracked.

Hoeffel- edits tracked.

Nehring - all accepted.

Scott- all accepted, except last addition. This was a SOUTHCOM issue not CENTCOM.

Woods- all accepted with an addition.

Van Alstyne- all accepted, and then edits based on our conversation with her this afternoon. After reading the stipulation to Ms. Van Alstyne, she corrected the portions that we added with more clarity.

v/r  
Ashden

From: Fein, Ashden MAJ USARMY MDW (US)  
To: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter  
CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US);  
Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Bcc: von Elten, Alexander S (Alec) CPT USARMY (US)  
Subject: RE: Stips  
Date: Monday, June 10, 2013 7:43:00 AM

---

MAJ Hurley,

I spoke to his SJA last night and he should be coordinating this phone meeting starting this morning.

v/r  
MAJ Fein

-----Original Message-----

From: Hurley, Thomas F MAJ USARMY (US)  
Sent: Monday, June 10, 2013 7:14 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

MAJ Fein

Some help would be great. I have no problem cold calling RADL Woods, but I think my identity and relationship to this case would have to be verified by someone.

Thanks.

MAJ Hurley

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Monday, June 10, 2013 2:35 AM  
To: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

MAJ Hurley,

I know I just sent the Stip back to you for review. If you would like us to assist with setting up a phone call, we will start first thing tomorrow morning.



v/r  
MAJ Fein

-----Original Message-----

From: Hurley, Thomas F MAJ USARMY (US)  
Sent: Sunday, June 09, 2013 6:31 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte,  
J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT  
USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

MAJ Fein

One stip we haven't said much about is RADL Woods. I would like to have him validate the stipulation and describe - in greater detail - his process of review. Do you have a good phone number for his aide? I anticipate that this will take a couple of days to knock out through email or a phone call.

Thanks.

MAJ Hurley

---

From: Fein, Ashden MAJ USARMY MDW (US)  
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To: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
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Subject: RE: Stips

MAJ Hurley,

That sounds like a good plan that we can work out tomorrow.

MAJ Fein

-----Original Message-----

From: Hurley, Thomas F MAJ USARMY (US)  
Sent: Sunday, June 09, 2013 5:46 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte,  
J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT  
USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

MAJ Fein

Here are the changes for Nehring. Is there a way that we can review all of the material (including the PEs) over lunch in order to avoid thumbing through hundreds of documents while everyone stares at us? My reading comprehension plummets under those conditions.

Thanks.

MAJ Hurley

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Sent: Sunday, June 09, 2013 9:12 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

Gents,

We also sent Grant and did not hear back.

Overall, you should still be getting back to us on Grant, Nehring, and Hoskins.\  
Thanks!

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 09, 2013 3:01 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
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Subject: RE: Stips

Sir

Attached are seven stips for which we request some modifications. We'll bring the other, signed copies over shortly.

Thanks,

Josh

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 09, 2013 12:30 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)

Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

Thanks.

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 09, 2013 12:30 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
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Subject: RE: Stips

Sir

We'll get you our changes to the others shortly for your review. We'll discuss the additional names and let you know this afternoon.

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From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 09, 2013 12:27 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

David,

Thank you. We will review and send back. Are you still reviewing the remainder or are those fine? Also what about the others that we added below?

v/r  
Ashden

-----Original Message-----

From: David Coombs [<mailto:coombs@armycourtmarshaldefense.com>]  
Sent: Sunday, June 09, 2013 8:52 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

Ashden,

Here are the changes for Debra Van Alstyne. Let me know if you have issues.  
If not, we will have this signed and sent to you this afternoon.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
coombs@armycourtmartrialdefense.com  
www.armycourtmartrialdefense.com <<http://www.armycourtmartrialdefense.com/>>  
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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fein.mil@mail.mil>]  
Sent: Saturday, June 08, 2013 8:03 PM  
To: David Coombs (coombs@armycourtmartrialdefense.com); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: Stips

Gents,

Attached are 12 stipulations. Tomorrow early afternoon we will send others and make classified ones available via a classified laptop, so that you can track changes, if needed.

We did not fill in PE numbers on here yet, because it would be best for you to review and let us know if there are issues.

Also, after reviewing the remainder of the witnesses, is the defense willing to stipulate to Glenn, Wisecarver, JohnsonG, and Larue?

Thanks!

v/r  
Ashden



From: Hurley, Thomas F MAJ USARMY (US)  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter  
CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US);  
Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips  
Date: Monday, June 10, 2013 7:13:44 AM

---

MAJ Fein

Some help would be great. I have no problem cold calling RADL Woods, but I think my identity and relationship to this case would have to be verified by someone.

Thanks.

MAJ Hurley

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Monday, June 10, 2013 2:35 AM  
To: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

MAJ Hurley,

I know I just sent the Stip back to you for review. If you would like us to assist with setting up a phone call, we will start first thing tomorrow morning.

v/r  
MAJ Fein

-----Original Message-----

From: Hurley, Thomas F MAJ USARMY (US)  
Sent: Sunday, June 09, 2013 6:31 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

MAJ Fein

One stip we haven't said much about is RADL Woods. I would like to have him validate the stipulation and

describe - in greater detail - his process of review. Do you have a good phone number for his aide? I anticipate that this will take a couple of days to knock out through email or a phone call.

Thanks.

MAJ Hurley

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 09, 2013 9:50 PM  
To: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte,  
J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT  
USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessie D SSG USARMY (US)  
Subject: RE: Stips

MAJ Hurley,

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MAJ Fein

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J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT  
USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessie D SSG USARMY (US)  
Subject: RE: Stips

MAJ Fein

Here are the changes for Nehring. Is there a way that we can review all of the material (including the PEs) over lunch in order to avoid thumbing through hundreds of documents while everyone stares at us? My reading comprehension plummets under those conditions.

Thanks.

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Subject: RE: Stips

Gents,

We also sent Grant and did not hear back.

Overall, you should still be getting back to us on Grant, Nehring, and Hoskins.  
Thanks!

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, June 09, 2013 3:01 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

Sir

Attached are seven stips for which we request some modifications. We'll bring the other, signed copies over shortly.

Thanks,

Josh

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From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 09, 2013 12:30 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

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Sent: Sunday, June 09, 2013 12:30 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
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Subject: RE: Stips



Sir

We'll get you our changes to the others shortly for your review. We'll discuss the additional names and let you know this afternoon.

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From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 09, 2013 12:27 PM  
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Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

David,

Thank you. We will review and send back. Are you still reviewing the remainder or are those fine? Also what about the others that we added below?

v/r  
Ashden

-----Original Message-----

From: David Coombs [<mailto:coombs@armycourt martialdefense.com>]  
Sent: Sunday, June 09, 2013 8:52 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

Ashden,

Here are the changes for Debra Van Alstyne. Let me know if you have issues.  
If not, we will have this signed and sent to you this afternoon.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
[coombs@armycourt martialdefense.com](mailto:coombs@armycourt martialdefense.com)  
[www.armycourt martialdefense.com](http://www.armycourt martialdefense.com) <<http://www.armycourt martialdefense.com>>  
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-----Original Message-----

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Sent: Saturday, June 08, 2013 8:03 PM

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Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT

USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)

CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2

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Gents,

Attached are 12 stipulations. Tomorrow early afternoon we will send others and make classified ones available via a classified laptop, so that you can track changes, if needed.

We did not fill in PE numbers on here yet, because it would be best for you to review and let us know if there are issues.

Also, after reviewing the remainder of the witnesses, is the defense willing to stipulate to Glenn, Wisecarver, JohnsonG, and Larue?

Thanks!

v/r  
Ashden

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To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stipulations  
Date: Monday, June 10, 2013 6:59:36 AM  
Attachments: 130609 (2200)-Stipulation of Expected Testimony (WoodsD).docx  
Consolidated List GTMO.pdf  
130609 (2200)-Stipulation of Expected Testimony (BoraW).docx

---

Ashden,

I am verifying the changes you made on Ms. Van-Alstyne's stipulation. Once I hear back from her, I will let you know. With regards to the other changes we will do the following:

Woods: I have attached an additional change based upon your addition. I have also attached the supporting document for that change.

Bora: We accepted all changes and made one minor change for clarity.

Hoeffel: Changes accepted.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [mailto:ashden.fein.mil@mail.mil]  
Sent: Sunday, June 09, 2013 10:33 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: Stipulations

Gents,

Attached are the below stipulations, Round #2. We have not finalized Hoskins, but will first thing tomorrow morning.

White- all accepted.

Thian- all accepted. Once it gets signed by the defense tomorrow, we will immediately send to DoS for final review by Ms. Thian.

Bora- edits tracked.

Hoeffel- edits tracked.

Nehring - all accepted.

Scott- all accepted, except last addition. This was a SOUTHCOM issue not CENTCOM.

Woods- all accepted with an addition.

Van Alstyne- all accepted, and then edits based on our conversation with her this afternoon. After reading the stipulation to Ms. Van Alstyne, she corrected the portions that we added with more clarity.

v/r  
Ashden

From: Fein, Ashden MAJ USARMY MDW (US)  
To: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
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Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Bcc: Clark, Derek D SGT USARMY USAMDW (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY  
MDW (US); Parra, Jairo A (JPI) CW2 USARMY USAMDW (US); Carskadon, Amy E CIV (US)  
Subject: RE: Stips  
Date: Sunday, June 09, 2013 10:35:00 PM

---

MAJ Hurley,

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v/r  
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To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
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Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
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Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
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Bcc: Clark, Derek D SGT USARMY USAMDW (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy F CIV (US)  
Subject: Stipulations  
Date: Sunday, June 09, 2013 10:32:00 PM  
Attachments: 130609 (2200)-Stipulation of Expected Testimony (WhiteF).docx  
130609 (2200)-Stipulation of Expected Testimony (WoodsD).docx  
130609 (2225)-Stipulation of Expected Testimony (VanAlstyneD).docx  
130609 (2229)-Stipulation of Expected Testimony (NehringM).docx  
130609 (1931)-Stipulation of Expected Testimony (ThianT).docx  
130609 (2033)-Stipulation of Expected Testimony (ScottL).docx  
130609 (2200)-Stipulation of Expected Testimony (BoraW).docx  
130609 (2200)-Stipulation of Expected Testimony (HoeffelP).docx

---

Gents,

Attached are the below stipulations, Round #2. We have not finalized Hoskins, but will first thing tomorrow morning.

White- all accepted.

Thian- all accepted. Once it gets signed by the defense tomorrow, we will immediately send to DoS for final review by Ms. Thian.

Bora- edits tracked.

Hoeffel- edits tracked.

Nehring - all accepted.

Scott- all accepted, except last addition. This was a SOUTHCOM issue not CENTCOM.

Woods- all accepted with an addition.

Van Alstyne- all accepted, and then edits based on our conversation with her this afternoon. After reading the stipulation to Ms. Van Alstyne, she corrected the portions that we added with more clarity.

v/r  
Ashden

From: Hurley, Thomas F MAJ USARMY (US)  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter  
CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US);  
Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips  
Date: Sunday, June 09, 2013 6:31:17 PM

---

MAJ Fein

One stip we haven't said much about is RADL Woods. I would like to have him validate the stipulation and describe - in greater detail - his process of review. Do you have a good phone number for his aide? I anticipate that this will take a couple of days to knock out through email or a phone call.

Thanks.

MAJ Hurley

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 09, 2013 9:50 PM  
To: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

MAJ Hurley,

That sounds like a good plan that we can work out tomorrow.

MAJ Fein

-----Original Message-----

From: Hurley, Thomas F MAJ USARMY (US)  
Sent: Sunday, June 09, 2013 5:46 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); David Coombs  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

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Thanks.

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Gents,

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Overall, you should still be getting back to us on Grant, Nehring, and Hoskins.\

Thanks!

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Ashden

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Subject: RE: Stips

Ashden,

Here are the changes for Debra Van Alstyne. Let me know if you have issues.

If not, we will have this signed and sent to you this afternoon.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
coombs@armycourt martialdefense.com  
www.armycourt martialdefense.com <<http://www.armycourt martialdefense.com/>>  
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From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fein.mil@mail.mil>]  
Sent: Saturday, June 08, 2013 8:03 PM  
To: David Coombs (coombs@armycourt martialdefense.com); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
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Subject: RE: Stips  
Date: Sunday, June 09, 2013 5:50:00 PM

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Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips  
Date: Sunday, June 09, 2013 5:46:11 PM  
Attachments: Nehring - Defense Changes.docx

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David E. Coombs, Esq.

Law Office of David E. Coombs

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Providence, RI 02906

Toll Free: 1-800-588-4156

Local: (508) 689-4616

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Bcc: Clark, Derek D SGT USARMY USAMDW (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy E CIV (US)  
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Date: Sunday, June 09, 2013 5:12:00 PM

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Attached are seven stips for which we request some modifications. We'll bring the other, signed copies over shortly.

Thanks,

Josh

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From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 09, 2013 12:30 PM  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
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David,

Thank you. We will review and send back. Are you still reviewing the remainder or are those fine? Also what about the others that we added below?

v/r  
Ashden

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From: David Coombs [<mailto:coombs@armycourtmarshaldefense.com>]  
Sent: Sunday, June 09, 2013 8:52 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
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Best,  
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David E. Coombs, Esq.  
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Sent: Saturday, June 08, 2013 8:03 PM  
To: David Coombs (coombs@armycourtartialdefense.com); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
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**Bcc:** Clark, Derek D SGT USARMY USAMDW (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy E CIV (US)  
**Subject:** RE: Stips  
**Date:** Sunday, June 09, 2013 4:22:00 PM  
**Attachments:** 130609 (1620)-Stipulation of Expected Testimony (NehringM).docx

---

Gents,

Attached is the Stip for Nehring. We will review the proposed edits today and have our next round by COB today.

v/r  
Ashden

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**From:** Tooman, Joshua J CPT USARMY (US)  
**Sent:** Sunday, June 09, 2013 3:01 PM  
**To:** Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
**Cc:** Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
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Best,  
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USARMY (US); Tooman, Joshua J CPT USARMY (US)

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Subject: Re: Stips  
Date: Sunday, June 09, 2013 3:01:49 PM

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Sent: Sunday, June 09, 2013 03:00 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs <coombs@armycourtmarialdefense.com>; Hurley, Thomas F MAJ USARMY (US)  
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Subject: RE: Stips  
Date: Sunday, June 09, 2013 3:00:40 PM  
Attachments: Woods\_Stip.docx  
White\_Stip.docx  
Thian\_Stip.docx  
Scott\_Stip.docx  
Hoefel\_Stip.docx  
Bora\_Stip.docx  
Artale\_Stips.docx

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**Sent:** Sunday, June 09, 2013 8:52 AM  
**To:** Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
**Cc:** Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
**Subject:** RE: Stips

Ashden,

Here are the changes for Debra Van Alstyne. Let me know if you have issues. If not, we will have this signed and sent to you this afternoon.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
coombs@armycourt martialdefense.com  
www.armycourt martialdefense.com <<http://www.armycourt martialdefense.com/>>

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fc.in.mil@mail.mil>]  
Sent: Saturday, June 08, 2013 8:03 PM  
To: David Coombs (coombs@armycourt martialdefense.com); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: Stips

Gents,

Attached are 12 stipulations. Tomorrow early afternoon we will send others and make classified ones available via a classified laptop, so that you can track changes, if needed.

We did not fill in PE numbers on here yet, because it would be best for you to review and let us know if there are issues.

Also, after reviewing the remainder of the witnesses, is the defense willing to stipulate to Glenn, Wisecarver, JohnsonG, and Larue?

Thanks!

v/r  
Ashden

From: Tooman, Joshua J CPT USARMY (US)  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs, Hurley, Thomas F MAJ USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips  
Date: Sunday, June 09, 2013 12:30:00 PM

---

Sir

We'll get you our changes to the others shortly for your review. We'll discuss the additional names and let you know this afternoon.

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Sunday, June 09, 2013 12:27 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

David,

Thank you. We will review and send back. Are you still reviewing the remainder or are those fine? Also what about the others that we added below?

v/r  
Ashden

-----Original Message-----

From: David Coombs [<mailto:coombs@armycourtmarshialdefense.com>]  
Sent: Sunday, June 09, 2013 8:52 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

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Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs

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Sent: Saturday, June 08, 2013 8:03 PM  
To: David Coombs (coombs@armycourt martialdefense.com); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: Stips

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v/r  
Ashden

From: Fein, Ashden MAJ USARMY MDW (US)  
To: "David Coombs"; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Bcc: Clark, Derek D SGT USARMY USAMDW (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy E CIV (US)  
Subject: RE: Stips  
Date: Sunday, June 09, 2013 12:27:00 PM

---

David,

Thank you. We will review and send back. Are you still reviewing the remainder or are those fine? Also what about the others that we added below?

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Ashden

-----Original Message-----

From: David Coombs [<mailto:coombs@armycourtartialdefense.com>]  
Sent: Sunday, June 09, 2013 8:52 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips

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David

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fein.mil@mail.mil>]

Sent: Saturday, June 08, 2013 8:03 PM

To: David Coombs (coombs@armycourt martialdefense.com); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: Stips

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Ashden



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To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Stips  
Date: Sunday, June 09, 2013 8:52:24 AM  
Attachments: 130608 (2000)-Stipulation of Expected Testimony (VanAlstyneD).docx

---

Ashden,

Here are the changes for Debra Van Alstyne. Let me know if you have issues.  
If not, we will have this signed and sent to you this afternoon.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [mailto:ashden.fein.mil@mail.mil]  
Sent: Saturday, June 08, 2013 8:03 PM  
To: David Coombs (coombs@armycourt martialdefense.com); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: Stips

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Thanks!

v/r  
Ashden

From: [Fein, Ashden MAJ USARMY MDW \(US\)](#)  
To: [David Coombs \(coombs@armycourtmarshaldefense.com\)](#); [Hurley, Thomas F MAJ USARMY \(US\)](#); [Tooman, Joshua J CPT USARMY \(US\)](#)  
Cc: [Morrow, JoDean \(Joe\) III CPT USARMY USAMDW \(US\)](#); [Overgaard, Angel M CPT USARMY \(US\)](#); [Whyte, J Hunter CPT USARMY \(US\)](#); [von Elten, Alexander S \(Alec\) CPT USARMY \(US\)](#); [Mitroka, Katherine F CPT USARMY \(US\)](#); [Ford, Arthur D Jr CW2 USARMY \(US\)](#); [Bennett, Jessica D SSG USARMY \(US\)](#)  
Bcc: [Clark, Derek D SGT USARMY USAMDW \(US\)](#); [Jorns, Claire V SGT USARMY \(US\)](#); [McLamb, Amber M SGT USARMY MDW \(US\)](#); [Parra, Jairo A \(JP\) CW2 USARMY USAMDW \(US\)](#); [Carskadon, Amy F CIV \(US\)](#)  
Subject: Stips  
Date: Saturday, June 08, 2013 8:03:00 PM  
Attachments: [130608 \(2000\)-Stipulation of Expected Testimony \(EllisK\).docx](#)  
[130608 \(2000\)-Stipulation of Expected Testimony \(ManderM\).docx](#)  
[130608 \(2000\)-Stipulation of Expected Testimony \(SchasteenD\).docx](#)  
[130608 \(2000\)-Stipulation of Expected Testimony \(ScottJ\).docx](#)  
[130608 \(2000\)-Stipulation of Expected Testimony \(ThianT\).docx](#)  
[130608 \(2000\)-Stipulation of Expected Testimony \(VanAlstyneD\).docx](#)  
[130608 \(2000\)-Stipulation of Expected Testimony \(WhiteF\).docx](#)  
[130608 \(2000\)-Stipulation of Expected Testimony \(WoodsD\).docx](#)  
[130608 \(1900\)-Stipulation of Expected Testimony \(BoraW\).docx](#)  
[130608 \(1900\)-Stipulation of Expected Testimony \(HoeffelP\).docx](#)  
[130608 \(1910\)-Stipulation of Expected Testimony \(RockR\).docx](#)  
[130608 \(1945\)-Stipulation of Expected Testimony \(ArtaleP\).docx](#)

---

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v/r  
Ashden

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** Tooman, Joshua J CPT USARMY (US); David Coombs (coombs@armycourt martialdefense.com); Hurley, Thomas F MAJ USARMY (US)  
**Cc:** Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Bcc:** Clark, Derek D SGT USARMY USAMDW (US); Johns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy F CIV (US)  
**Subject:** RE: Stips  
**Date:** Saturday, June 08, 2013 11:22:00 AM

---

Thank you.

-----Original Message-----

**From:** Tooman, Joshua J CPT USARMY (US)  
**Sent:** Saturday, June 08, 2013 11:06 AM  
**To:** Fein, Ashden MAJ USARMY MDW (US); David Coombs (coombs@armycourt martialdefense.com); Hurley, Thomas F MAJ USARMY (US)  
**Cc:** Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Subject:** RE: Stips

Sir

A couple things on Artale:

1. The title of the document ends with a question mark, not a period. Thus, any reference to the document should reflect the inquisitive nature of the document's title. That is, "Wikileaks.org-An Online Reference to Foreign Intelligence Services, Insurgents, or Terrorist Groups?"
2. Please add that the logs do not indicate whether the user actually viewed the .pdf or Word file. Likewise, the logs do not indicate whether the document was printed or saved, nor do they indicate how long an individual looked at the document, if at all.

Thanks,  
Josh

---

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**Sent:** Friday, June 07, 2013 7:52 PM  
**To:** David Coombs (coombs@armycourt martialdefense.com); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
**Cc:** Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Subject:** Stips

Gents,

The following stips are attached:

1. Buchanan. Made the requested changes. We did not track changes for the "neutral" search because it would be a mess. We highlighted the account creation time for you to review.
2. Artale.

3. Chamberlin.

4. Grant.

5. Wilbur.

More to follow tomorrow.

v/r

Ashden

From: Tooman, Joshua J CPT USARMY (US)  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs (coombs@armycourtartialdefense.com); Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stips  
Date: Saturday, June 08, 2013 11:06:31 AM

---

Sir

A couple things on Artale:

1. The title of the document ends with a question mark, not a period. Thus, any reference to the document should reflect the inquisitive nature of the document's title. That is, "Wikileaks.org-An Online Reference to Foreign Intelligence Services, Insurgents, or Terrorist Groups?"
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Sent: Friday, June 07, 2013 7:52 PM  
To: David Coombs (coombs@armycourtartialdefense.com); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: Stips

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v/r  
Ashden

From: Tooman, Joshua J CPT USARMY (US)  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs (coombs@armycourtmarshaldefense.com); Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stips  
Date: Saturday, June 08, 2013 9:56:29 AM

---

Got 'em, sir. We'll take a look. Thanks.

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Friday, June 07, 2013 7:52 PM  
To: David Coombs (coombs@armycourtmarshaldefense.com); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
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Ashden

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**To:** [David Coombs \(coombs@armycourt martialdefense.com\)](mailto:David.Coombs@armycourt martialdefense.com); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
**Cc:** [Bennett, Jessica D SSG USARMY \(US\)](#); [Morrow, JoDean \(Joe\) III CPT USARMY USAMDW \(US\)](#); [Overgaard, Angel M CPT USARMY \(US\)](#); [Whyte, J Hunter CPT USARMY \(US\)](#); [von Elten, Alexander S \(Alec\) CPT USARMY \(US\)](#); [Mitroka, Katherine F CPT USARMY \(US\)](#); [Ford, Arthur D Jr CW2 USARMY \(US\)](#)  
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**Subject:** Stips  
**Date:** Friday, June 07, 2013 7:52:00 PM  
**Attachments:** [130607 \(1900\)-Stipulation of Expected Testimony \(Grant\).docx](#)  
[130607 \(1900\)-Stipulation of Expected Testimony \(Wilbur\).docx](#)  
[130607 \(1900\)-Stipulation of Expected Testimony \(BuchananS\).docx](#)  
[130607 \(1930\)-Stipulation of Expected Testimony \(ChamberlinS\).docx](#)  
[130607 \(1952\)-Stipulation of Expected Testimony \(ArtaleP\).docx](#)

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Ashden



From: David Coombs  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Mitroka, Katherine F CPT USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: stips  
Date: Friday, June 07, 2013 12:34:12 PM

---

Ashden,

We will sign and return to you at 1400.

Best,  
David

----- Original message -----

From: "Fein, Ashden MAJ USARMY MDW (US)" <ashden.fein.mil@mail.mil>  
Date: 06/07/2013 12:08 PM (GMT-05:00)  
To: "David Coombs (coombs@armycourtartialdefense.com)" <coombs@armycourtartialdefense.com>,"Hurley, Thomas F MAJ USARMY (US)" <thomas.f.hurley4.mil@mail.mil>,"Tooman, Joshua J CPT USARMY (US)" <joshua.j.tooman.mil@mail.mil>  
Cc: "Bennett, Jessica D SSG USARMY (US)" <jessica.d.bennett.mil@mail.mil>,"Mitroka, Katherine F CPT USARMY (US)" <katherine.f.mitroka2.mil@mail.mil>,"Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)" <jodean.morrow.mil@mail.mil>,"Overgaard, Angel M CPT USARMY (US)" <angel.m.overgaard.mil@mail.mil>,"von Elten, Alexander S (Alec) CPT USARMY (US)" <alexander.s.vonelten.mil@mail.mil>,"Whyte, J Hunter CPT USARMY (US)" <jeffrey.h.whyte.mil@mail.mil>,"Ford, Arthur D Jr CW2 USARMY (US)" <arthur.d.ford.mil@mail.mil>  
Subject: stips

Gents,

Withers and Fung attached. We accepted all changes with no additions. Bettencourt is also attached.

v/r  
Ashden

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** David Coombs ([coombs@armycourtmartrialdefense.com](mailto:coombs@armycourtmartrialdefense.com)); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
**Cc:** Bennett, Jessica D SSG USARMY (US); Mitroka, Katherine F CPT USARMY (US); Morrow, JoDean (Joel) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Bcc:** Clark, Derek D SGT USARMY USAMDW (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy F CIV (US)  
**Subject:** stips  
**Date:** Friday, June 07, 2013 12:08:00 PM  
**Attachments:** 130607 (1158h)-Stipulation of Expected Testimony (WithersA).docx  
130607 (1158h)-Stipulation of Expected Testimony (FungJ).docx  
130607 (1207h)-Stipulation of Expected Testimony (BettencourtT1).docx

---

Gents,

Withers and Fung attached. We accepted all changes with no additions. Bettencourt is also attached.

v/r  
Ashden

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** "Hurley, Thomas F MAJ OSD OMC Defense"  
**Cc:** [David Coombs \(coombs@armycourt martialdefense.com\)](mailto:David.Coombs@armycourt martialdefense.com); Tooman, Joshua J CPT USARMY (US)  
**Subject:** RE: Fung and Withers Stipulations  
**Date:** Friday, June 07, 2013 10:05:00 AM

---

Thank you. We will start looking at these ASAP. And send more as we complete.

-----Original Message-----

**From:** Hurley, Thomas F MAJ OSD OMC Defense [<mailto:Thomas.Hurley@osd.mil>]  
**Sent:** Friday, June 07, 2013 8:36 AM  
**To:** Fein, Ashden MAJ USARMY MDW (US)  
**Cc:** David Coombs ([coombs@armycourt martialdefense.com](mailto:coombs@armycourt martialdefense.com)); Tooman, Joshua J CPT USARMY (US)  
**Subject:** Fung and Withers Stipulations

MAJ Fein

Attached please find the Fung and Withers stips that include some changes (noted in track changes). Sorry this took longer than we expected. We have no changes to the McManus stip. The Yun stip is going to take a while, but we should have those changes to you by mid-afternoon.

v/r

MAJ Hurley

**From:** [Hurley, Thomas F MAJ OSD OMC Defense](#)  
**To:** [Fein, Ashden MAJ USARMY MDW \(US\)](#)  
**Cc:** [David Coombs \(coombs@armycourtmarshialdefense.com\); Tooman, Joshua J CPT USARMY \(US\)](#)  
**Subject:** Fung and Withers Stipulations  
**Date:** Friday, June 07, 2013 8:38:05 AM  
**Attachments:** [130605-Stipulation of Expected Testimony \(Fung\).docx](#)  
[130605-Stipulation of Expected Testimony \(WithersA\).docx](#)

---

MAJ Fein

Attached please find the Fung and Withers stips that include some changes (noted in track changes). Sorry this took longer than we expected. We have no changes to the McManus stip. The Yun stip is going to take a while, but we should have those changes to you by mid-afternoon.

v/r

MAJ Hurley

From: David Coombs  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stip  
Date: Thursday, June 06, 2013 8:05:44 PM

---

Ashden,

Good to hear that you are moving forward with all the stip. I am really hoping that we can give COL Lind at least 30 or so on Monday to show her that we were productive over the break. We will return the stip that you sent to us either signed or with comments tomorrow.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [mailto:ashden.fein.mil@mail.mil]  
Sent: Thursday, June 06, 2013 7:40 PM  
To: 'coombs@armycourt martialdefense.com'; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: Re: Stip

David, we are moving forward with all stip. I will send each one as we finish them. State stip were the exception so that we can ensure both parties are on the same sheet.

Vr  
Ashden

----- Original Message -----

From: David Coombs [mailto:coombs@armycourtartialdefense.com]  
Sent: Thursday, June 06, 2013 11:21 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US);  
Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY  
USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY  
(US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F  
CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stip

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Sent: Thursday, June 06, 2013 6:35 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT  
USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY  
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(US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F  
CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stip

David,

As I get them, I will send them. I do expect many more over the next 2 days. We are holding on the rest of the DOS Stips until you get back to me on PDAS Yun's.

v/r  
Ashden

-----Original Message-----

From: David Coombs [<mailto:combs@armycourt martialdefense.com>]  
Sent: Thursday, June 06, 2013 6:28 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US);  
Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY  
USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY  
(US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F  
CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stip

Ashden,

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once they are signed. Do you expect to have more tomorrow?

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fein.mil@mail.mil>]  
Sent: Thursday, June 06, 2013 4:52 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ  
USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY  
USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY  
(US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F  
CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stip

Gents. Please use the attached Stip. It has the updated PE numbers  
included - 61 and 62.

-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Thursday, June 06, 2013 4:50 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT

USARMY (US)

Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY  
USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY  
(US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F  
CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)

Subject: Stip

Gents,

The stip for Mr. Buchanan is attached.

Thus far, you should have the following:

Mr. Fung

Mr. Withers

Mr. McManus

Mr. Buchanan

PDAS Yun (classified)

Thanks!

v/r

MAJ Fein



From: Fein, Ashden MAJ USARMY MDW (US)  
To: "coombs@armycourt martialdefense.com"; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
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Subject: Re: Stip  
Date: Thursday, June 06, 2013 7:39:59 PM

---

David, we are moving forward with all stip. I will send each one as we finish them. State stip were the exception so that we can ensure both parties are on the same sheet.

Vr  
Ashden

----- Original Message -----

From: David Coombs [mailto:coombs@armycourt martialdefense.com]  
Sent: Thursday, June 06, 2013 11:21 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stip

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Best,  
David

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To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
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v/r  
Ashden

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From: David Coombs [mailto:coombs@armycourtartialdefense.com]  
Sent: Thursday, June 06, 2013 6:28 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
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Subject: RE: Stip

Ashden,

Thank you. We will go over these tomorrow with PFC M and run them to you once they are signed. Do you expect to have more tomorrow?

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Sent: Thursday, June 06, 2013 4:52 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
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Subject: RE: Stip

Gents. Please use the attached Stip. It has the updated PE numbers included - 61 and 62.

-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US)  
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To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessie D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: Stip

Gents,

The stip for Mr. Buchanan is attached.

Thus far, you should have the following:

Mr. Fung  
Mr. Withers  
Mr. McManus  
Mr. Buchanan  
PDAS Yun (classified)

Thanks!

v/r  
MAJ Fein

From: David Coombs  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
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Subject: RE: Stip  
Date: Thursday, June 06, 2013 7:21:27 PM

---

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-----Original Message-----

From: David Coombs [mailto:coombs@armycourtartialdefense.com]  
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To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US);  
Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY  
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Mr. Fung

Mr. Withers

Mr. McManus

Mr. Buchanan

PDAS Yun (classified)

Thanks!

v/r

MAJ Fein

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To: "David Coombs"; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
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Subject: Clark, Derek D SGT USARMY USAMDW (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy E CIV (US)  
RE: Stip  
Date: Thursday, June 06, 2013 6:34:00 PM

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coombs@armycourtartialdefense.com  
www.armycourtartialdefense.com

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [mailto:ashden.fein.mil@mail.mil]  
Sent: Thursday, June 06, 2013 4:52 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stip

Gents. Please use the attached Stip. It has the updated PE numbers included - 61 and 62.

-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Thursday, June 06, 2013 4:50 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: Stip

Gents,

The stip for Mr. Buchanan is attached.

Thus far, you should have the following:

Mr. Fung  
Mr. Withers  
Mr. McManus  
Mr. Buchanan  
PDAS Yun (classified)

Thanks!

v/r  
MAJ Fein



From: David Coombs  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stip  
Date: Thursday, June 06, 2013 6:28:10 PM

---

Ashden,

Thank you. We will go over these tomorrow with PFC M and run them to you once they are signed. Do you expect to have more tomorrow?

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
coombs@armycourt martialdefense.com  
www.armycourt martialdefense.com

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fein.mil@mail.mil>]  
Sent: Thursday, June 06, 2013 4:52 PM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stip

Gents. Please use the attached Stip. It has the updated PE numbers included - 61 and 62.

-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Thursday, June 06, 2013 4:50 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY

(US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F  
CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: Stip

Gents,

The stip for Mr. Buchanan is attached.

Thus far, you should have the following:

Mr. Fung  
Mr. Withers  
Mr. McManus  
Mr. Buchanan  
PDAS Yun (classified)

Thanks!

v/r  
MAJ Fein

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
**Cc:** Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Bcc:** Clark, Derek D SGT USARMY USAMDW (US); Joins, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy E CIV (US)  
**Subject:** RE: Stip  
**Date:** Thursday, June 06, 2013 4:51:00 PM  
**Attachments:** 130606-Stipulation of Expected Testimony (BuchananS) - updated.docx

---

Gents. Please use the attached Stip. It has the updated PE numbers included - 61 and 62.

-----Original Message-----

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**Sent:** Thursday, June 06, 2013 4:50 PM  
**To:** David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
**Cc:** Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Subject:** Stip

Gents,

The stip for Mr. Buchanan is attached.

Thus far, you should have the following:

Mr. Fung  
Mr. Withers  
Mr. McManus  
Mr. Buchanan  
PDAS Yun (classified)

Thanks!

v/r  
MAJ Fein

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** David Coombs: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
**Cc:** Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Bcc:** Clark, Derek D SGT USARMY USAMDW (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy E CIV (US)  
**Subject:** Stip  
**Date:** Thursday, June 06, 2013 4:49:00 PM  
**Attachments:** 130606-Stipulation of Expected Testimony (BuchananS).docx

---

Gents,

The stip for Mr. Buchanan is attached.

Thus far, you should have the following:

Mr. Fung  
Mr. Withers  
Mr. McManus  
Mr. Buchanan  
PDAS Yun (classified)

Thanks!

v/r  
MAJ Fein

From: Hurley, Thomas F MAJ USARMY (US)  
To: Fein, Ashden MAJ USARMY MDW (US)  
Cc: Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Subject: RE: Yun Stip  
Date: Thursday, June 06, 2013 1:18:29 PM

---

MAJ Fein

I acknowledge receipt of the stipulation for Mr. Yun.

v/r

tfh

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Thursday, June 06, 2013 5:12 PM  
To: Hurley, Thomas F MAJ USARMY (US)  
Cc: Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Subject: Yun Stip

MAJ Hurley,

The purpose of this email is to account for me hand delivering a copy today of our proposed stipulation of expected testimony for Yun that is classified secret noform.

Thanks.

v/r

MAJ Fein

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** Hurley, Thomas F MAJ USARMY (US)  
**Cc:** Ford, Arthur D Jr CW2 USARMY (US); Clark, Derek D SGT USARMY USAMDW (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
**Subject:** Yun Stip  
**Date:** Thursday, June 06, 2013 1:12:00 PM

---

MAJ Hurley,

The purpose of this email is to account for me hand delivering a copy today of our proposed stipulation of expected testimony for Yun that is classified secret noform.

Thanks.

v/r  
MAJ Fein

From: Tooman, Joshua J CPT USARMY (US)  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Email  
Date: Wednesday, June 05, 2013 12:40:20 PM

---

Thanks, sir.

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Wednesday, June 05, 2013 9:03 AM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: Email

Defense,

All members of the prosecution deleted both emails from our computer systems without reading them.

v/r  
MAJ Fein

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US)  
**Cc:** Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Bcc:** Clark, Derek D SGT USARMY USAMDW (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy E CIV (US)  
**Subject:** Email  
**Date:** Wednesday, June 05, 2013 9:03:00 AM

---

Defense,

All members of the prosecution deleted both emails from our computer systems without reading them.

v/r  
MAJ Fein



From: Fein, Ashden MAJ USARMY MDW (US)  
To: Tooman, Joshua J CPT USARMY (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Bcc: Clark, Derek D SGT USARMY USAMDW (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy E CIV (US)  
Subject: RE: Stips  
Date: Wednesday, June 05, 2013 7:28:00 AM

---

Josh,

We are deleting our emails. David just replied to your email and we are not reading that one either. I will confirm when the entire team deleted your email and David's email.

v/r  
MAJ Fein

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Wednesday, June 05, 2013 7:05 AM  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stips

All

I sent an reply to this email that was intended for the Defense team only. I'd ask that if you have not read it, please delete it.

Thanks,

Josh

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Tuesday, June 04, 2013 11:19 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: Stips

Gents,

Attached are the first two stips in the Katz hard drive chain of custody. The third is ready and we just have to verify the serial numbers and hash value. We also have the Steve Buchanan stip completed, and although its unclassified, its on SIPR. We should have burning capability tomorrow to move it from SIPR to NIPR. Finally, I will review

the Yun stipulation tomorrow at lunch and be able to give that to you for review.

v/r

Ashden

From: Tooman, Joshua J CPT USARMY (US)  
To: Fein, Ashden MAJ USARMY MDW (US); David Coombs; Hurley, Thomas F MAJ USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stips  
Date: Wednesday, June 05, 2013 7:04:41 AM

---

All

I sent an reply to this email that was intended for the Defense team only. I'd ask that if you have not read it, please delete it.

Thanks,

Josh

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Tuesday, June 04, 2013 11:19 PM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: Stips

Gents,

Attached are the first two stips in the Katz hard drive chain of custody. The third is ready and we just have to verify the serial numbers and hash value. We also have the Steve Buchanan stip completed, and although its unclassified, its on SIPR. We should have burning capability tomorrow to move it from SIPR to NIPR. Finally, I will review the Yun stipulation tomorrow at lunch and be able to give that to you for review.

v/r  
Ashden

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** "David Coombs"; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
**Cc:** Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Bcc:** Clark, Derek D SGT USARMY USAMDW (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy F CIV (US)  
**Subject:** Stips  
**Date:** Tuesday, June 04, 2013 11:19:00 PM  
**Attachments:** 130604-Stipulation of Expected Testimony (WithersA).docx  
130604-Stipulation of Expected Testimony (FungJ).docx

---

Gents,

Attached are the first two stips in the Katz hard drive chain of custody. The third is ready and we just have to verify the serial numbers and hash value. We also have the Steve Buchanan stip completed, and although its unclassified, its on SIPR. We should have burning capability tomorrow to move it from SIPR to NIPR. Finally, I will review the Yun stipulation tomorrow at lunch and be able to give that to you for review.

v/r  
Ashden

From: Fein, Ashden MAJ USARMY MDW (US)  
To: "coombs@armycourtartialdefense.com"; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Bcc: von Elten, Alexander S (Alec) CPT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Carskadon, Amy F CIV (US); Overgaard, Angel M CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Jorns, Claire V SGT USARMY (US); Clark, Derek D SGT USARMY USAMDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Whyte, J Hunter CPT USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Mitroka, Katherine F CPT USARMY (US)  
Subject: Re: Government Filings, etc.  
Date: Sunday, June 02, 2013 5:13:00 PM

---

Thank you.

----- Original Message -----

From: David Coombs [<mailto:coombs@armycourtartialdefense.com>]

Sent: Sunday, June 02, 2013 09:08 PM

To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US)

Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)

Subject: RE: Government Filings, etc.

Ashden,

Not a problem. Whatever way is easier for you we can do on the stipulations. Just print up a new version, and we will have it signed tomorrow.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
[coombs@armycourtartialdefense.com](mailto:coombs@armycourtartialdefense.com)  
[www.armycourtartialdefense.com](http://www.armycourtartialdefense.com)

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fein.mil@mail.mil>]

Sent: Sunday, June 02, 2013 11:18 AM

To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT

USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT  
USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)  
CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2  
USARMY (US)  
Subject: RE: Government Filings, etc.

David,

Thank you. We will review this today.

Attached are the following stipulations of expected testimony: Edwards, Clapper, Mairena, Robertson, and Young. We did a final review of the physical evidence and realized that we transcribed a serial number incorrectly into the authentication stipulations. Unfortunately, we need to update these to reflect the serial number confusion. Also, you will see for Edwards and Robertson, we added two lines that has them identify the evidence as "PE # for ID." All changes are tracked.

For Robertson, I attached a separate stipulation that accounts for the identifying of the PEs, in case you do not want to re-execute the main stipulation. I used the version Josh sent Thursday, 30 May 2013 at 1810 hours.

We have the physical evidence on-site starting today, and can make it available for you to confirm the PE for ID markings and authenticity, if needed.

Thank you!

V/r  
Ashden

-----Original Message-----

From: David Coombs [mailto:coombs@armycourtartialdefense.com]  
Sent: Sunday, June 02, 2013 8:20 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT  
USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)  
CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2  
USARMY (US)  
Subject: RE: Government Filings, etc.

Ashden,

I have reviewed the document and made changes by either highlighting the change or by using track changes for information that I deleted from the original. Let me know if you have any issues.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs

11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
coombs@armycourt martialdefense.com  
www.armycourt martialdefense.com

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fein.mil@mail.mil>]  
Sent: Saturday, June 01, 2013 11:59 PM  
To: 'coombs@armycourt martialdefense.com'; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Government Filings, etc.

Defense,

Attached is the combined judicial notice. Please let us know whether there are any discrepancies.

V/r  
MAJ Fein

-----Original Message-----

From: Lind, Denise R COL USARMY (US)  
Sent: Saturday, June 01, 2013 1:40 PM  
To: Fein, Ashden MAJ USARMY MDW (US)  
Cc: 'coombs@armycourt martialdefense.com'; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); USARMY Ft McNair mdw Mailbox MDW Court Reporters OMB; Raffel, Michael J SFC USARMY (US); Jefferson, Dashawn MSG USARMY (US); Moore, Katrina R MSG USARMY (US)  
Subject: Re: Government Filings, etc.

Received. Thank you. Please have hard copy of all for the Court Monday morning.  
D

----- Original Message -----

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Saturday, June 01, 2013 04:59 PM  
To: Lind, Denise R COL USARMY (US)  
Cc: David Coombs <[coombs@armycourt martialdefense.com](mailto:coombs@armycourt martialdefense.com)>; Hurley, Thomas F MAJ

USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); USARMY Ft McNair mdw Mailbox MDW Court Reporters OMB; Raffel, Michael J SFC USARMY (US); Jefferson, Dashawn MSG USARMY (US); Moore, Katrina R MSG USARMY (US)  
Subject: Government Filings, etc.

Ma'am,

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v/r  
MAJ Fein



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To: Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Government Filings, etc.  
Date: Sunday, June 02, 2013 5:08:55 PM

---

Ashden,

Not a problem. Whatever way is easier for you we can do on the stipulations. Just print up a new version, and we will have it signed tomorrow.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
coombs@armycourtmarshialdefense.com  
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From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fein.mil@mail.mil>]  
Sent: Sunday, June 02, 2013 11:18 AM  
To: David Coombs; Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Government Filings, etc.

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Thank you!

V/r  
Ashden

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Sent: Sunday, June 02, 2013 8:20 AM

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USARMY (US)

Subject: RE: Government Filings, etc.

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David E. Coombs, Esq.

Law Office of David E. Coombs

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Providence, RI 02906

Toll Free: 1-800-588-4156

Local: (508) 689-4616

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Subject: RE: Government Filings, etc.  
Date: Sunday, June 02, 2013 11:17:00 AM  
Attachments: 130602-Stipulation of Expected Testimony (ClapperC).docx  
130602-Stipulation of Expected Testimony (EdwardsA).docx  
130602-Stipulation of Expected Testimony (MairenaT).docx  
130602-Stipulation of Expected Testimony (RobertsonC) Final 2-1.docx  
130602-Stipulation of Expected Testimony (RobertsonC) ShortAdditional.docx  
130602-Stipulation of Expected Testimony (YoungG).docx

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Ashden

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**Subject:** RE: Government Filings, etc.  
**Date:** Sunday, June 02, 2013 8:20:13 AM  
**Attachments:** 130601 - Combined Judicial Notice Accounting .docx

---

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David E. Coombs, Esq.  
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Subject: RE: Government Filings, etc.  
Date: Saturday, June 01, 2013 11:59:00 PM  
Attachments: 130601 - Combined Judicial Notice Accounting .docx

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**Subject:** Discovery Update  
**Date:** Saturday, June 01, 2013 12:18:00 AM

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Defense,

We produced additional discovery under our ongoing discovery obligations. We have it available to deliver by hand tomorrow, when you drop off the Robertson stipulation. There is classified and unclassified discovery.

BATES #: 00527646 – 00527777 is classified information including witness briefs, additional Katz information, screenshots, and summaries for trial.

BATES #: 00527778 – 00527808 is unclassified information including pretrial recordings, witness bios, and a different produced version of the OPSEC briefing recovered on digital evidence.

As we finalize them, we intend to provide copies of summaries we intend to use at trial prior to a witness's testimony. This will be on a rolling basis.

v/r  
MAJ Fein

**From:** Hurley, Thomas F MAJ USARMY (US)  
**To:** Fein, Ashden MAJ USARMY MDW (US)  
**Cc:** "coombs@armycourt martialdefense.com"; Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joel) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Filten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); USARMY Ft McNair mdw Mailbox MDW Court Reporters OMB; Raffol, Michael J SFC USARMY (US); Jefferson, Dashawn MSG USARMY (US); Moore, Katrina R MSG USARMY (US)  
**Subject:** Robertson's Stipulation  
**Date:** Friday, May 31, 2013 1:43:32 PM

---

All

I have signed Robertson's stipulation, but I cannot scan it in. You guys going to be around the courthouse tomorrow morning? I can just hand-deliver it then.

Thanks.

MAJ Hurley

**From:** Tooman, Joshua J CPT USARMY (US)  
**To:** Parra, Jairo A (JP) CW2 USARMY USAMDW (US)  
**Cc:** Fein, Ashden MAJ USARMY MDW (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US);  
"coombs@armycourtmarshaldefense.com"; Hurley, Thomas F MAJ USARMY (US); Trent Struttmann; Bennett,  
Jessica D SSG USARMY (US)  
**Subject:** Badge for Trent (UNCLASSIFIED)  
**Date:** Friday, May 31, 2013 8:45:38 AM

---

Classification: UNCLASSIFIED

Caveats: NONE

JP

Can you please add Trent to the list so he can park at the courthouse. Also, he'll need a badge. He will be there for the start of trial on Monday.

Thanks!

V/R

Joshua J. Tooman  
CPT, JA  
Trial Defense Counsel  
9990 Belvoir Drive  
Fort Belvoir, VA 22060  
Tel: (703) 805-4383  
Fax: (703) 805-4413  
joshua.tooman@us.army.mil

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Classification: UNCLASSIFIED

Caveats: NONE

**From:** Tooman, Joshua J CPT USARMY (US)  
**To:** Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Fein, Ashden MAJ USARMY MDW (US); "coombs@armycourt martialdefense.com"  
**Cc:** Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Subject:** Robertson Stip (UNCLASSIFIED)  
**Date:** Thursday, May 30, 2013 6:10:03 PM  
**Attachments:** RobertsonStip (FINAL 2 0).docx

---

Classification: UNCLASSIFIED

Caveats: NONE

All

FYI: I made an additional, non-substantive change to this stip. I altered MAJ H's signature block to capture his rank, branch and duty position.

Joshua J. Tooman  
CPT, JA  
Trial Defense Counsel  
9990 Belvoir Drive  
Fort Belvoir, VA 22060  
Tel: (703) 805-4383  
Fax: (703) 805-4413  
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-----Original Message-----

**From:** Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
**Sent:** Thursday, May 30, 2013 1:24 PM  
**To:** Tooman, Joshua J CPT USARMY (US); Fein, Ashden MAJ USARMY MDW (US); 'coombs@armycourt martialdefense.com'  
**Cc:** Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Subject:** RE: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

Josh,

Thanks. Looks good.

CPT Joe Morrow  
Trial Counsel  
U.S. Army Military District of Washington  
Phone: 202-685-1975  
NIPR: jodean.morrow.mil@mail.mil  
SIPR: jodean.morrow@jfhqncr.northcom.smil.mil

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Thursday, May 30, 2013 1:02 PM  
To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Fein, Ashden MAJ USARMY MDW (US); 'coombs@armycourtmarialdefense.com'  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

Joe

See attached.

Joshua J. Tooman  
CPT, JA  
Trial Defense Counsel  
9990 Belvoir Drive  
Fort Belvoir, VA 22060  
Tel: (703) 805-4383  
Fax: (703) 805-4413  
joshua.tooman@us.army.mil

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-----Original Message-----

From: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Sent: Thursday, May 30, 2013 12:46 PM  
To: Tooman, Joshua J CPT USARMY (US); Fein, Ashden MAJ USARMY MDW (US); 'coombs@armycourtmarialdefense.com'  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED



Caveats: NONE

Yes, make the change. Thank you.

CPT Joe Morrow  
Trial Counsel  
U.S. Army Military District of Washington  
Phone: 202-685-1975  
NIPR: jodcan.morrow.mil@mail.mil  
SIPR: jodcan.morrow@jfhqncr.northcom.smil.mil

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Thursday, May 30, 2013 12:45 PM  
To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Fein, Ashden MAJ USARMY MDW (US); 'coombs@armycourt martialdefense.com'  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessice D SSG USARMY (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

Joe

You are correct; I forgot the 12 JUL 07 portion. Would you like me to make the change?

v/r  
Josh

Joshua J. Tooman  
CPT, JA  
Trial Defense Counsel  
9990 Belvoir Drive  
Fort Belvoir, VA 22060  
Tel: (703) 805-4383  
Fax: (703) 805-4413  
joshua.tooman@us.army.mil

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-----Original Message-----

From: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Sent: Thursday, May 30, 2013 12:43 PM  
To: Tooman, Joshua J CPT USARMY (US); Fein, Ashden MAJ USARMY MDW (US);

'coombs@armycourtmartrialdefense.com'

Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

Josh,

We have no objection to clarification, but I just re-checked the forensic report and the file was named "12 Jul 07 CZ ENGAGEMENT ZONE GC Anyone.wmv". I believe you left off the "12 Jul 07" below.

Bottom line - No objection to modifying the stip with the appropriate full file name.

CPT Joe Morrow  
Trial Counsel  
U.S. Army Military District of Washington  
Phone: 202-685-1975  
NIPR: jodean.morrow.mil@mail.mil  
SIPR: jodean.morrow@jfhqncr.northcom.smil.mil

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Thursday, May 30, 2013 12:29 PM  
To: Fein, Ashden MAJ USARMY MDW (US); 'coombs@armycourtmartrialdefense.com'  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

All

PFC Manning signed all the stips this morning with the exception of the Calder Robertson stip. MAJ Hurley will sign them this afternoon and we will forward them on.

As for Robertson, we request one more minor change and I apologize for not catching it earlier. In paragraph 7c, towards the end, there is a sentence that says, "One file contained no data and the other filed contained a video called 'Collateral Murder'." We would like to clarify that this file was not actually named "Collateral Murder." Rather, it contained a file named "CZ ENGAGEMENT ZONE 30 GC Anyone.wmv." Assuming you do not have an issue with this change and Howard County will allow SSG Bennett to visit the client, we should be able to have a corrected copy signed tomorrow.

Thanks,

Josh

Classification: UNCLASSIFIED  
Caveats: NONE

Classification: UNCLASSIFIED  
Caveats: NONE

Classification: UNCLASSIFIED  
Caveats: NONE

Classification: UNCLASSIFIED  
Caveats: NONE

Classification: UNCLASSIFIED  
Caveats: NONE

Classification: UNCLASSIFIED  
Caveats: NONE

Classification: UNCLASSIFIED  
Caveats: NONE

From: Fein, Ashden MAJ USARMY MDW (US)  
To: Tooman, Joshua J CPT USARMY (US); 'coombs@armycourtmarialdefense.com'  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Bcc: Clark, Derek D SGT USARMY USAMDW (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy E CIV (US)  
Subject: RE: Stipulations (UNCLASSIFIED)  
Date: Thursday, May 30, 2013 4:59:00 PM

---

Thank you!

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Thursday, May 30, 2013 4:14 PM  
To: Fein, Ashden MAJ USARMY MDW (US); 'coombs@armycourtmarialdefense.com'  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

All

Signed stips are attached.

Joshua J. Tooman  
CPT, JA  
Trial Defense Counsel  
9990 Belvoir Drive  
Fort Belvoir, VA 22060  
Tel: (703) 805-4383  
Fax: (703) 805-4413  
joshua.tooman@us.army.mil

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Thursday, May 30, 2013 3:51 PM  
To: Tooman, Joshua J CPT USARMY (US); 'coombs@armycourtmarialdefense.com'  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT

USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)  
CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2  
USARMY (US)  
Subject: RE: Stipulations (UNCLASSIFIED)

Gents,

Thanks. Once we receive them from MAJ Hurley, we will print and sign, and then waive off the witness travel.

v/r  
MAJ Fein

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Thursday, May 30, 2013 12:29 PM  
To: Fein, Ashden MAJ USARMY MDW (US); 'coombs@armycourt martialdefense.com'  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US);  
Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT  
USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)  
CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2  
USARMY (US)  
Subject: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

All

PFC Manning signed all the stips this morning with the exception of the  
Calder Robertson stip. MAJ Hurley will sign them this afternoon and we will  
forward them on.

As for Robertson, we request one more minor change and I apologize for not  
catching it earlier. In paragraph 7c, towards the end, there is a sentence  
that says, "One file contained no data and the other filed contained a video  
called 'Collateral Murder.'" We would like to clarify that this file was  
not actually named "Collateral Murder." Rather, it contained a file named  
"CZ ENGAGEMENT ZONE 30 GC Anyone.wmv." Assuming you do not have an issue  
with this change and Howard County will allow SSG Bennett to visit the  
client, we should be able to have a corrected copy signed tomorrow.

Thanks,  
Josh

Classification: UNCLASSIFIED  
Caveats: NONE

Classification: UNCLASSIFIED  
Caveats: NONE

**From:** Tooman, Joshua J CPT USARMY (US)  
**To:** Fein, Ashden MAJ USARMY MDW (US); 'coombs@armycourt martialdefense.com'  
**Cc:** Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Subject:** RE: Stipulations (UNCLASSIFIED)  
**Date:** Thursday, May 30, 2013 4:14:13 PM  
**Attachments:** Amiatu\_Stip.pdf  
Clapper\_Stip.pdf  
Edwards\_Stip.pdf  
Mairena\_Stip.pdf  
Marin\_Stip.pdf  
Young\_Stip.pdf

---

Classification: UNCLASSIFIED

Caveats: NONE

All

Signed stips are attached.

Joshua J. Tooman  
CPT, JA  
Trial Defense Counsel  
9990 Belvoir Drive  
Fort Belvoir, VA 22060  
Tel: (703) 805-4383  
Fax: (703) 805-4413  
joshua.tooman@us.army.mil

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-----Original Message-----

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**Sent:** Thursday, May 30, 2013 3:51 PM  
**To:** Tooman, Joshua J CPT USARMY (US); 'coombs@armycourt martialdefense.com'  
**Cc:** Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Subject:** RE: Stipulations (UNCLASSIFIED)

Gents,

Thanks. Once we receive them from MAJ Hurley, we will print and sign, and then waive off the witness travel.

v/r  
MAJ Fein

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Thursday, May 30, 2013 12:29 PM  
To: Fein, Ashden MAJ USARMY MDW (US); 'coombs@armycourt martialdefense.com'  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US);  
Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT  
USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alce)  
CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2  
USARMY (US)  
Subject: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED  
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All

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client, we should be able to have a corrected copy signed tomorrow.

Thanks,  
Josh

Classification: UNCLASSIFIED  
Caveats: NONE

Classification: UNCLASSIFIED  
Caveats: NONE

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** Tooman, Joshua J CPT USARMY (US): "coombs@armycourtmarshialdefense.com"  
**Cc:** Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katharine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Bcc:** Clark, Derek D SGT USARMY USAMDW (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy E CIV (US)  
**Subject:** RE: Stipulations (UNCLASSIFIED)  
**Date:** Thursday, May 30, 2013 3:50:00 PM

---

Gents,

Thanks. Once we receive them from MAJ Hurley, we will print and sign, and then waive off the witness travel.

v/r  
MAJ Fein

-----Original Message-----

**From:** Tooman, Joshua J CPT USARMY (US)  
**Sent:** Thursday, May 30, 2013 12:29 PM  
**To:** Fein, Ashden MAJ USARMY MDW (US); 'coombs@armycourtmarshialdefense.com'  
**Cc:** Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Subject:** Stipulations (UNCLASSIFIED)

**Classification:** UNCLASSIFIED  
**Caveats:** NONE

All

PFC Manning signed all the stips this morning with the exception of the Calder Robertson stip. MAJ Hurley will sign them this afternoon and we will forward them on.

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Thanks,  
Josh

**Classification:** UNCLASSIFIED  
**Caveats:** NONE



From: Tooman, Joshua J CPT USARMY (US)  
To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Fein, Ashden MAJ USARMY MDW (US); "coombs@armycourt martialdefense.com"  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stipulations (UNCLASSIFIED)  
Date: Thursday, May 30, 2013 1:28:46 PM

---

Classification: UNCLASSIFIED  
Caveats: NONE

Great. SSG Bennett will get it signed tomorrow morning.

Joshua J. Tooman  
CPT, JA  
Trial Defense Counsel  
9990 Belvoir Drive  
Fort Belvoir, VA 22060  
Tel: (703) 805-4383  
Fax: (703) 805-4413  
joshua.tooman@us.army.mil

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-----Original Message-----

From: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Sent: Thursday, May 30, 2013 1:24 PM  
To: Tooman, Joshua J CPT USARMY (US); Fein, Ashden MAJ USARMY MDW (US); "coombs@armycourt martialdefense.com"  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

Josh,

Thanks. Looks good.

CPT Joe Morrow  
Trial Counsel  
U.S. Army Military District of Washington  
Phone: 202-685-1975

NIPR: jodean.morrow.mil@mail.mil  
SIPR: jodean.morrow@jfhqncr.northcom.smil.mil

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Thursday, May 30, 2013 1:02 PM  
To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Fein, Ashden MAJ USARMY MDW (US); 'coombs@armycourt martialdefense.com'  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

Joe

See attached.

Joshua J. Tooman  
CPT, JA  
Trial Defense Counsel  
9990 Belvoir Drive  
Fort Belvoir, VA 22060  
Tel: (703) 805-4383  
Fax: (703) 805-4413  
joshua.tooman@us.army.mil

This communication may be privileged as attorney work product and/or attorney-client communication or may be protected by another privilege recognized under the law. Do not distribute, forward, or release without the prior approval of the sender. In addition, this communication may contain individually identifiable information the disclosure of which, to any person or agency not entitled to receive it, is or may be prohibited by the Privacy Act, 5 U.S.C. §552a. Improper disclosure of protected information could result in civil action or criminal prosecution.

-----Original Message-----

From: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Sent: Thursday, May 30, 2013 12:46 PM  
To: Tooman, Joshua J CPT USARMY (US); Fein, Ashden MAJ USARMY MDW (US); 'coombs@armycourt martialdefense.com'  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

Yes, make the change. Thank you.

CPT Joe Morrow  
Trial Counsel  
U.S. Army Military District of Washington  
Phone: 202-685-1975  
NIPR: jodean.morrow.mil@mail.mil  
SIPR: jodean.morrow@jfhqncr.northcom.smil.mil

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Thursday, May 30, 2013 12:45 PM  
To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Fein, Ashden MAJ USARMY MDW (US); 'coombs@armycourt martialdefense.com'  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

Joe

You are correct; I forgot the 12 JUL 07 portion. Would you like me to make the change?

v/r  
Josh

Joshua J. Tooman  
CPT, JA  
Trial Defense Counsel  
9990 Belvoir Drive  
Fort Belvoir, VA 22060  
Tel: (703) 805-4383  
Fax: (703) 805-4413  
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From: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Sent: Thursday, May 30, 2013 12:43 PM  
To: Tooman, Joshua J CPT USARMY (US); Fein, Ashden MAJ USARMY MDW (US); 'coombs@armycourt martialdefense.com'  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY

(US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

Josh,

We have no objection to clarification, but I just re-checked the forensic report and the file was named "12 Jul 07 CZ ENGAGEMENT ZONE GC Anyone.wmv". I believe you left off the "12 Jul 07" below.

Bottom line - No objection to modifying the stip with the appropriate full file name.

CPT Joe Morrow  
Trial Counsel  
U.S. Army Military District of Washington  
Phone: 202-685-1975  
NIPR: jodean.morrow.mil@mail.mil  
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Subject: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

All

PFC Manning signed all the stips this morning with the exception of the Calder Robertson stip. MAJ Hurley will sign them this afternoon and we will forward them on.

As for Robertson, we request one more minor change and I apologize for not catching it earlier. In paragraph 7c, towards the end, there is a sentence that says, "One file contained no data and the other filed contained a video called 'Collateral Murder'." We would like to clarify that this file was not actually named "Collateral Murder." Rather, it contained a file named "CZ ENGAGEMENT ZONE 30 GC Anyone.wmv." Assuming you do not have an issue with this change and Howard County will allow SSG Bennett to visit the client, we should be able to have a corrected copy signed tomorrow.

Thanks,  
Josh

Classification: UNCLASSIFIED  
Caveats: NONE

Classification: UNCLASSIFIED  
Caveats: NONE

Classification: UNCLASSIFIED  
Caveats: NONE

Classification: UNCLASSIFIED  
Caveats: NONE

Classification: UNCLASSIFIED  
Caveats: NONE

Classification: UNCLASSIFIED  
Caveats: NONE

Classification: UNCLASSIFIED  
Caveats: NONE

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To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Fein, Ashden MAJ USARMY MDW (US); "coombs@armycourtmarshaldefense.com"  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stipulations (UNCLASSIFIED)  
Date: Thursday, May 30, 2013 1:01:41 PM  
Attachments: RobertsonStip (FINAL 2.0).docx

---

Classification: UNCLASSIFIED

Caveats: NONE

Joe

See attached.

Joshua J. Tooman  
CPT, JA  
Trial Defense Counsel  
9990 Belvoir Drive  
Fort Belvoir, VA 22060  
Tel: (703) 805-4383  
Fax: (703) 805-4413  
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Subject: RE: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

Yes, make the change. Thank you.

CPT Joe Morrow  
Trial Counsel  
U.S. Army Military District of Washington  
Phone: 202-685-1975

NIPR: jodean.morrow.mil@mail.mil  
SIPR: jodean.morrow@jfhqncr.northcom.smil.mil

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Subject: RE: Stipulations (UNCLASSIFIED)

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You are correct; I forgot the 12 JUL 07 portion. Would you like me to make the change?

v/r  
Josh

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Subject: RE: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

Josh,

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Bottom line - No objection to modifying the stip with the appropriate full file name.

CPT Joe Morrow  
Trial Counsel  
U.S. Army Military District of Washington  
Phone: 202-685-1975  
NIPR: jodean.morrow.mil@mail.mil  
SIPR: jodean.morrow@jfhqncr.northcom.smil.mil

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Subject: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

All

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Thanks,  
Josh

Classification: UNCLASSIFIED

Caveats: NONE

Classification: UNCLASSIFIED



Caveats: NONE

Classification: UNCLASSIFIED

Caveats: NONE

Classification: UNCLASSIFIED

Caveats: NONE

Classification: UNCLASSIFIED

Caveats: NONE

From: Tooman, Joshua J CPT USARMY (US)  
To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Fein, Ashden MAJ USARMY MDW (US); "coombs@armycourtmarshalfense.com"  
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Subject: RE: Stipulations (UNCLASSIFIED)  
Date: Thursday, May 30, 2013 12:45:10 PM

---

Classification: UNCLASSIFIED  
Caveats: NONE

Joe

You are correct; I forgot the 12 JUL 07 portion. Would you like me to make the change?

v/r  
Josh

Joshua J. Tooman  
CPT, JA  
Trial Defense Counsel  
9990 Belvoir Drive  
Fort Belvoir, VA 22060  
Tel: (703) 805-4383  
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Classification: UNCLASSIFIED  
Caveats: NONE

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report and the file was named "12 Jul 07 CZ ENGAGEMENT ZONE GC Anyone.wmv".  
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CPT Joe Morrow  
Trial Counsel  
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SIPR: jodean.morrow@jfhqncr.northcom.smil.mil

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Sent: Thursday, May 30, 2013 12:29 PM  
To: Fein, Ashden MAJ USARMY MDW (US); 'coombs@armycourt martialdefense.com'  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessice D SSG USARMY (US);  
Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT  
USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)  
CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2  
USARMY (US)  
Subject: Stipulations (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

All

PFC Manning signed all the stips this morning with the exception of the  
Calder Robertson stip. MAJ Hurley will sign them this afternoon and we will  
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As for Robertson, we request one more minor change and I apologize for not  
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with this change and Howard County will allow SSG Bennett to visit the  
client, we should be able to have a corrected copy signed tomorrow.

Thanks,  
Josh

Classification: UNCLASSIFIED  
Caveats: NONE

Classification: UNCLASSIFIED  
Caveats: NONE

Classification: UNCLASSIFIED

Caveats: NONE

From: Tooman, Joshua J CPT USARMY (US)  
To: Fein, Ashden MAJ USARMY MDW (US); "coombs@armycourt martialdefense.com"  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joo) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: Stipulations (UNCLASSIFIED)  
Date: Thursday, May 30, 2013 12:28:52 PM

---

Classification: UNCLASSIFIED

Caveats: NONE

All

PFC Manning signed all the stips this morning with the exception of the Calder Robertson stip. MAJ Hurley will sign them this afternoon and we will forward them on.

As for Robertson, we request one more minor change and I apologize for not catching it earlier. In paragraph 7c, towards the end, there is a sentence that says, "One file contained no data and the other filed contained a video called 'Collateral Murder'." We would like to clarify that this file was not actually named "Collateral Murder." Rather, it contained a file named "CZ ENGAGEMENT ZONE 30 GC Anyone.wmv." Assuming you do not have an issue with this change and Howard County will allow SSG Bennett to visit the client, we should be able to have a corrected copy signed tomorrow.

Thanks,  
Josh

Classification: UNCLASSIFIED

Caveats: NONE

From: David Coombs  
To: Fein, Ashden MAJ USARMY MDW (US)  
Cc: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: Additional Reciprocal Discovery  
Date: Wednesday, May 29, 2013 6:14:05 PM  
Attachments: 028711-028712.pdf  
028713-028713.pdf

---

Ashden,

I have attached an additional three pages of reciprocal discovery. Please let me know if you have any questions.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
coombs@armycourtmartialdefense.com  
www.armycourtmartialdefense.com

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From: [Fein, Ashden MAJ USARMY MDW \(US\)](#)  
To: ["coombs@armycourtmarialdefense.com"](#)  
Cc: [Hurley, Thomas F MAJ USARMY \(US\)](#); [Tooman, Joshua J CPT USARMY \(US\)](#); [Bennett, Jessica D SSG USARMY \(US\)](#); [Morrow, JoDean \(Joe\) III CPT USARMY USAMDW \(US\)](#); [Overgaard, Angel M CPT USARMY \(US\)](#); [Whyte, J Hunter CPT USARMY \(US\)](#); [von Elten, Alexander S \(Alec\) CPT USARMY \(US\)](#); [Mitroka, Katherine F CPT USARMY \(US\)](#); [Ford, Arthur D Jr CW2 USARMY \(US\)](#)  
Subject: Re: Stipulations  
Date: Wednesday, May 29, 2013 12:06:12 PM

---

Thank you.

----- Original Message -----

From: David Coombs [<mailto:coombs@armycourtmarialdefense.com>]  
Sent: Wednesday, May 29, 2013 04:00 PM  
To: Fein, Ashden MAJ USARMY MDW (US)  
Cc: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stipulations

Ashden,

We have reviewed all of the other stipulations and do not have an issues.  
We will have these signed tomorrow and send them to you.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
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[coombs@armycourtmarialdefense.com](mailto:coombs@armycourtmarialdefense.com)  
[www.armycourtmarialdefense.com](http://www.armycourtmarialdefense.com)

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fein.mil@mail.mil>]  
Sent: Tuesday, May 28, 2013 8:03 PM  
To: David Coombs  
Cc: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)

Subject: Stipulations

David,

We have figured out how to combine tracked changes to figure out if other changes have been made, so we will send the word versions going forward as you requested. Below is a summary of the active stips we are tracking.

Marin. We accepted all changes we agreed to. We spoke with Marin again this weekend and the following two changes remain: first, in paragraph 7, we rewrote the sentence you deleted relating to OPSEC; second, in paragraph 8, SSG Marin has since had the opportunity to review all slides and we incorporated his specific reference to information from the slides that he remembers being taught on.

Clapper. Chain of custody information.

Edwards. Chain of custody information.

Young. Chain of custody information.

Mariena. Chain of custody information.

Amiatu. JAMMS records.

Robertson. Joe sent this on Monday and Josh confirmed that it should be good to go.

This should be it for the first 25 witnesses. We will look one more time tomorrow to see if there are any others.

v/r  
Ashden



From: David Coombs  
To: Fein, Ashden MAJ USARMY MDW (US)  
Cc: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stipulations  
Date: Wednesday, May 29, 2013 12:00:27 PM

---

Ashden,

We have reviewed all of the other stipulations and do not have an issues.  
We will have these signed tomorrow and send them to you.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
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Subject: Stipulations

David,

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v/r  
Ashden

From: David Coombs  
To: Fein, Ashden MAJ USARMY MDW (US)  
Cc: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stipulations  
Date: Wednesday, May 29, 2013 10:49:36 AM

---

Ashden,

No issues with the changes. We should be able to get back to you by noon on the other stipulations. Assuming that they are good, we will have them signed tomorrow morning by PFC Manning.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
coombs@armycourt martialdefense.com  
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From: Fein, Ashden MAJ USARMY MDW (US) [<mailto:ashden.fein.mil@mail.mil>]  
Sent: Wednesday, May 29, 2013 10:25 AM  
To: David Coombs  
Cc: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
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**Subject:** RE: Stipulations  
**Date:** Wednesday, May 29, 2013 9:48:00 AM  
**Attachments:** 130529-Stipulation of Expected Testimony (MarinA).pdf

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Ashden

From: Tooman, Joshua J CPT USARMY (US)  
To: Parra, Jairo A (JPL CW2 USARMY USAMDW (US); Fein, Ashden MAJ USARMY MDW (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Cc: David Coombs; Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: Secret Printer (UNCLASSIFIED)  
Date: Wednesday, May 29, 2013 9:39:49 AM

---

Classification: UNCLASSIFIED

Caveats: NONE

JP

We are in need of more ink for our Secret printer. It is a Dell Model #3130cn. How should we go about obtaining this need?

V/R

Joshua J. Tooman  
CPT, JA  
Trial Defense Counsel  
9990 Belvoir Drive  
Fort Belvoir, VA 22060  
Tel: (703) 805-4383  
Fax: (703) 805-4413  
joshua.tooman@us.army.mil

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-----Original Message-----

From: Bennett, Jessica D SSG USARMY (US)  
Sent: Wednesday, May 29, 2013 9:37 AM  
To: Tooman, Joshua J CPT USARMY (US)  
Subject: SIPR Printer (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

Good morning,

The printer is a Dell 3130cn.

V/R

SSG Bennett

Classification: UNCLASSIFIED

Caveats: NONE

Classification: UNCLASSIFIED

Caveats: NONE

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Subject: RE: Stipulations  
Date: Wednesday, May 29, 2013 8:05:53 AM  
Attachments: 130528-Stipulation of Expected Testimony (MarinA).docx

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Subject: Re: Stipulations  
Date: Tuesday, May 28, 2013 9:40:27 PM

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Ashden



From: David Coombs  
To: Fein, Ashden MAJ USARMY MDW (US)  
Cc: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: RE: Stipulations  
Date: Tuesday, May 28, 2013 8:11:41 PM

---

Ashden,

What day did you speak with SSG Marin?

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
coombs@armycourt martialdefense.com  
www.armycourt martialdefense.com

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [mailto:ashden.fein.mil@mail.mil]  
Sent: Tuesday, May 28, 2013 8:03 PM  
To: David Coombs  
Cc: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: Stipulations

David,

We have figured out how to combine tracked changes to figure out if other changes have been made, so we will send the word versions going forward as you requested. Below is a summary of the active stips we are tracking.

Marin. We accepted all changes we agreed to. We spoke with Marin again this weekend and the following two changes remain: first, in paragraph 7, we rewrote the sentence you deleted relating to OPSEC; second, in paragraph 8, SSG Marin has since had the opportunity to review all slides and we incorporated his specific reference to information from the slides that he

remembers being taught on.

Clapper. Chain of custody information.

Edwards. Chain of custody information.

Young. Chain of custody information.

Mariena. Chain of custody information.

Amiatu. JAMMS records.

Robertson. Joe sent this on Monday and Josh confirmed that it should be good to go.

This should be it for the first 25 witnesses. We will look one more time tomorrow to see if there are any others.

v/r  
Ashden

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** "David Coombs"  
**Cc:** Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Jon) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Eiten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Bcc:** Clark, Derek D SGT USARMY USAMDW (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy F CIV (US)  
**Subject:** Stipulations  
**Date:** Tuesday, May 28, 2013 8:03:00 PM  
**Attachments:** 130528-Stipulation of Expected Testimony (AmiatuM).docx  
130528-Stipulation of Expected Testimony (ClapperC).docx  
130528-Stipulation of Expected Testimony (EdwardsA).docx  
130528-Stipulation of Expected Testimony (MairenaT).docx  
130528-Stipulation of Expected Testimony (MarinA).docx  
130528-Stipulation of Expected Testimony (YoungG).docx

---

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v/r  
Ashden

From: David Coombs  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US)  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Mr. Adkins  
Date: Tuesday, May 28, 2013 7:17:21 PM

---

Thank you.

Best  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
coombs@armycourt martialdefense.com  
www.armycourt martialdefense.com

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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [mailto:ashden.fein.mil@mail.mil]  
Sent: Tuesday, May 28, 2013 6:14 PM  
To: David Coombs; Tooman, Joshua J CPT USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US)  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Mr. Adkins

David,

SFC (R) Adkins can be reached at koenigsburg14@aol.com or at 305-772-3093.

v/r  
Ashden

-----Original Message-----

From: David Coombs [mailto:coombs@armycourt martialdefense.com]  
Sent: Sunday, May 26, 2013 9:21 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US)  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: Mr. Adkins

Ashden,

Please provide me with the best contact information for Mr. Adkins. Thank you.

Best,

David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906

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coombs@armycourtartialdefense.com <<mailto:coombs@armycourtartialdefense.com>>

www.armycourtartialdefense.com <<http://www.armycourtartialdefense.com/>>

From: Fein, Ashden MAJ USARMY MDW (US)  
To: "David Coombs"; Tooman, Joshua J CPT USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US)  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Bcc: Clark, Derek D SGT USARMY USAMDW (US); Ford, Arthur D Jr CW2 USARMY (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy E CIV (US); Mitroka, Katherine F CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Whyte, J Hunter CPT USARMY (US)  
Subject: RE: Mr. Adkins  
Date: Tuesday, May 28, 2013 6:14:00 PM

---

David,

SFC (R) Adkins can be reached at [koenigsburg14@aol.com](mailto:koenigsburg14@aol.com) or at 305-772-3093.

v/r  
Ashden

-----Original Message-----

From: David Coombs [<mailto:coombs@armycourtartialdefense.com>]  
Sent: Sunday, May 26, 2013 9:21 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US)  
Cc: Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: Mr. Adkins

Ashden,

Please provide me with the best contact information for Mr. Adkins. Thank you.

Best,

David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
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[www.armycourtartialdefense.com](http://www.armycourtartialdefense.com) <<http://www.armycourtartialdefense.com/>>

From: Tooman, Joshua J CPT USARMY (US)  
To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Cc: David E. Coombs; Hurley, Thomas F MAJ USARMY (US); Fein, Ashden MAJ USARMY MDW (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Final Robertson Stip (UNCLASSIFIED)  
Date: Monday, May 27, 2013 11:39:56 AM

---

Joe

The Robertson stip looks good to me. Would you like us to print this version for BM's signature?

V/R

Josh

---

From: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Sent: Monday, May 27, 2013 11:30 AM  
To: Tooman, Joshua J CPT USARMY (US)  
Cc: David E. Coombs; Hurley, Thomas F MAJ USARMY (US); Fein, Ashden MAJ USARMY MDW (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Final Robertson Stip (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

Thanks.

CPT Joe Morrow  
Trial Counsel  
U.S. Army Military District of Washington  
Phone: 202-685-1975  
NIPR: jodean.morrow.mil@mail.mil  
SIPR: jodean.morrow@jfhqncr.northcom.smil.mil

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Monday, May 27, 2013 11:26 AM  
To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Cc: David E. Coombs; Hurley, Thomas F MAJ USARMY (US); Fein, Ashden MAJ USARMY MDW (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Final Robertson Stip (UNCLASSIFIED)

Got it. Thanks, Joe. I'll take a look.

Ideally, we'll be able to take a bunch of these stips to BM at one time. I hope we can take a batch to him mid-week.

Happy Memorial Day to you, as well.

Josh

---

From: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Sent: Monday, May 27, 2013 11:18 AM  
To: Tooman, Joshua J CPT USARMY (US)  
Cc: David E. Coombs; Hurley, Thomas F MAJ USARMY (US); Fein, Ashden MAJ  
USARMY MDW (US); Bennett, Jessica D SSG USARMY (US)  
Subject: Final Robertson Stip (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

Josh,

See attached. Every comment you made has been addressed. With item 6, I believe any confusion is addressed by paragraph 9, which describes what Robertson is talking about when he says he collected two specific items of evidence and annotated that collection on DN 073-10. I added one sentence in paragraph 9 to make this more clear - "I collected this evidence at the CID office on Camp Liberty."

Item 1 in your email is addressed in paragraph 4.

Item 2 in your email is addressed in paragraph 7d.

Item 3 in your email is addressed in paragraph 7d.

Item 4 in your email is addressed in paragraph 7e. Per our phone discussion yesterday and our agreement, I left JA's name as Robertson remembers that. All the rest of the text has been added verbatim from your email to make it clear that the contact information was not of a personal nature.

Item 5 in your email is addressed in paragraph 7f.

Finally, do you have any idea when you'll be able to run this stipulation by PFC BM?

Happy Memorial Day.



CPT Joe Morrow

Trial Counsel

U.S. Army Military District of Washington

Phone: 202-685-1975

NIPR: jodean.morrow.mil@mail.mil

SIPR: jodean.morrow@jfhqncr.northcom.smil.mil

Classification: UNCLASSIFIED

Caveats: NONE

Classification: UNCLASSIFIED

Caveats: NONE

From: Tooman, Joshua J CPT USARMY (US)  
To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Cc: David E. Coombs; Hurley, Thomas F MAJ USARMY (US); Fein, Ashden MAJ USARMY MDW (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Final Robertson Stip (UNCLASSIFIED)  
Date: Monday, May 27, 2013 11:25:35 AM

---

Got it. Thanks, Joe. I'll take a look.

Ideally, we'll be able to take a bunch of these stip to BM at one time. I hope we can take a batch to him mid-week.

Happy Memorial Day to you, as well.

Josh

---

From: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Sent: Monday, May 27, 2013 11:18 AM  
To: Tooman, Joshua J CPT USARMY (US)  
Cc: David E. Coombs; Hurley, Thomas F MAJ USARMY (US); Fein, Ashden MAJ USARMY MDW (US); Bennett, Jessica D SSG USARMY (US)  
Subject: Final Robertson Stip (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

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See attached. Every comment you made has been addressed. With item 6, I believe any confusion is addressed by paragraph 9, which describes what Robertson is talking about when he says he collected two specific items of evidence and annotated that collection on DN 073-10. I added one sentence in paragraph 9 to make this more clear – "I collected this evidence at the CID office on Camp Liberty."

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U.S. Army Military District of Washington

Phone: 202-685-1975

NIPR: jodean.morrow.mil@mail.mil

SIPR: jodean.morrow@jfhqncr.northcom.smil.mil

Classification: UNCLASSIFIED

Caveats: NONE

**From:** David Coombs  
**To:** Fein, Ashden MAJ USARMY MDW (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bonnett, Jessica D SSG USARMY (US)  
**Cc:** Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (AleC) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Subject:** RE: Word Versions and VTC/Telephonic Testimony  
**Date:** Sunday, May 26, 2013 8:16:42 PM

---

Ashden,

Your comments do not make sense to me regarding PDF versus Word versions. The stipulations are collaborative documents and you do not get to control the editing of the documents. Using track changes, the way the rest of the world does, is a much quicker way of facilitating the process than by having us tell you what changes we want, having you make those changes, and then us reviewing the changes, and possibly getting back to you with additional concerns. Ultimately, the Defense is the side with the final say on any stipulation, since it is our client who is waiving his Sixth Amendment rights. If you don't like the stipulation that we can agree to, then it is your prerogative to bring the witness.

Also, you must have either sent your message with a delayed delivery option, or you failed to see that I have already sent an edited version with track changes for SSG Marin's stipulation in Word. Regardless, we will be sending back track changes documents in Word for any stipulation for this point forward. Additionally, your plan of doing stipulations witness by witness seems to be yet another example of a lack of due diligence. You have known for over two months the names of the witnesses that we would likely stipulate to. How we are at a week before trial with so few stipulations completed is beyond me, but it has nothing to do with the Defense. At the current rate of a witness or two per day, we will be wrapping up the stipulations towards the end of trial.

To clarify once again, the Defense has never changed its positions on stipulations of expected testimony. We simply did not agree to entering into stipulations of admissibility for documents and evidence. The fact that you did not understand this position or did not want to accept this position is not the Defense's fault.

Finally, with regards to the telephonic testimony, our position is, has, and continues to be that if you have an OCONUS witness that you do not want to bring in person and instead want them to testify either by VTC or telephonically, we will likely agree to that request. All you need to do is give us a list of those witnesses and we will let you know if we would object to remote testimony for any specifically listed witness.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
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-----Original Message-----

From: Fein, Ashden MAJ USARMY MDW (US) [mailto:ashden.fein.mil@mail.mil]

Sent: Sunday, May 26, 2013 7:47 PM

To: coombs@armycourt martialdefense.com; Hurley, Thomas F MAJ USARMY (US);

Tooman, Joshua J CPT USARMY (US); Bennett, Jessica D SSG USARMY (US)

Cc: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT

USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec)

CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)

Subject: Word Versions and VTC/Telephonic Testimony

David,

The reason we are not sending them in word version is so that we can track exactly what changes the defense would like to make and we can continue pushing through the stipulations. As you know, both parties have agreed to 80+ stipulations, and we have to prepare them as we prepare for trial. It is more efficient if the defense sends us the comments, like Josh did earlier for Robertson, so we can review just the proposed changes, have a discussion with the defense if needed, and then make the changes and move on to the next.

For the past few months, the defense team members have unfortunately changed their positions on stipulations and what is acceptable or not. To get this done in time and efficiently, the trial counsel must keep control of the documents so we know exactly what has changed or not- tracked changes does not necessarily do that. For example, we now have to spend time going through, word-for-word, the Marin Stip you sent back to validate whether this is the information the trial counsel agreed upon and the witness would testify to based on our multiple conversations, and then review your proposed edits. If the parties truly want 80+ stipulations, then this time is better spent working on the next stipulations and coordinating travel.

In the spirit of ongoing cooperation and collaboration, attached are the two most recent stips in word version. With only one week until trial, we will continue to send the PDF versions so we (prosecution and defense) can knock these out VERY quickly.

Finally, as for telephonic testimony, we will provide a list in our next update to the witness list order. Although the Court did get clarification from your client himself during the last 39(a), defense counsel prior to that consistently stated the defense would agree to VTC/telephonic testimony for "any" or "all" OCONUS witnesses. Are there any specific witnesses that you will object to, so that the parties know going forward for planning purposes and don't have to spend time figuring this out?

v/r  
Ashden

**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** [coombs@armycourtmarshialdefense.com](mailto:coombs@armycourtmarshialdefense.com); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US); Bennett, Jessie D SSG USARMY (US)  
**Cc:** Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); Whyte, J Hunter CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
**Bcc:** Clark, Derek D SGT USARMY USAMDW (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JP) CW2 USARMY USAMDW (US); Carskadon, Amy F CIV (US)  
**Subject:** Word Versions and VTC/Telephonic Testimony  
**Date:** Sunday, May 26, 2013 7:47:00 PM  
**Attachments:** [130524-Stip of Expected Testimony \(MarinA\) \(FOR DEFENSE\).docx](#)  
[130524-Stipulation of Expected Testimony \(RobertsonC\) \(FOR DEFENSE\).docx](#)

---

David,

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v/r  
Ashden

From: David Coombs  
To: Whyte, J Hunter CPT USARMY (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Fein, Ashden MAJ USARMY MDW (US)  
Subject: RE: Stipulation of Expected Testimony  
Date: Sunday, May 26, 2013 2:13:48 PM  
Attachments: 130524-Stip of Expected Testimony (MarinA).doc

---

Hunter,

Here are the changes that we would require in order to stipulate to SSG Marin's testimony. Let me know if you have any questions.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
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-----Original Message-----

From: Whyte, J Hunter CPT USARMY (US) [<mailto:jeffrey.h.whyte.mil@mail.mil>]  
Sent: Friday, May 24, 2013 6:36 PM  
To: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Fein, Ashden MAJ USARMY MDW (US);  
'coombs@armycourt martialdefense.com'  
Subject: Stipulation of Expected Testimony

Gents,

Attached is a proposed stipulation of expected testimony for SSG Alejandro Marin. As you know, SSG Marin is currently deployed and he is also one of our first 25 witnesses. For that reason, can you please let us know your thoughts on the attached stipulation, so everyone (especially his command in theater) is on notice when we need to coordinate his travel for the court-martial? Thank you!

Have a good weekend!



v/r  
Hunter

From: David Coombs  
To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Tooman, Joshua J CPT USARMY (US); Hurley, Thomas F MAJ USARMY (US)  
Cc: Fein, Ashden MAJ USARMY MDW (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Robertson stipulation (UNCLASSIFIED)  
Date: Sunday, May 26, 2013 11:16:50 AM

---

Joe,

With regards to OCONUS witnesses, our position has always been that if you have a list of OCONUS witnesses that you would want to testify telephonically, we would likely not object. However, we needed to have a list of those witnesses to ensure that we did not want a particular one in person. This was covered by the Court during our last 39(a).

Best,

David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906

Toll Free: 1-800-588-4156

Local: (508) 689-4616

Fax: (508) 689-9282  
coombs@armycourt martialdefense.com

www.armycourt martialdefense.com <<http://www.armycourt martialdefense.com/>>

\*\*\*Confidentiality Notice: This transmission, including attachments, may contain confidential attorney-client information and is intended for the person(s) or company named. If you are not the intended recipient, please notify the sender and delete all copies. Unauthorized disclosure, copying or use of this information may be unlawful and is prohibited.\*\*\*

From: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US) [<mailto:jodean.morrow.mil@mail.mil>]  
Sent: Sunday, May 26, 2013 10:32 AM  
To: 'coombs@armycourt martialdefense.com'; Tooman, Joshua J CPT USARMY (US); Hurley, Thomas F MAJ USARMY (US)  
Cc: Fein, Ashden MAJ USARMY MDW (US); Bennett, Jessica D SSG USARMY (US)  
Subject: Re: Robertson stipulation (UNCLASSIFIED)

David,

I will talk to Josh later today and finalize. However, Robertson is an OCONUS witness and my understanding was that you all were waiving the personal appearance of OCONUS witnesses anyway. As such, I didn't think this would be a big deal. Sorry for my confusion.

CPT Morrow  
571-305-3646

From: David Coombs [<mailto:coombs@armycourt martialdefense.com>]

Sent: Sunday, May 26, 2013 02:27 PM

To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Tooman, Joshua J CPT USARMY (US); Hurley, Thomas F MAJ USARMY (US)

Cc: Fein, Ashden MAJ USARMY MDW (US); Bennett, Jessica D SSG USARMY (US)

Subject: RE: Robertson stipulation (UNCLASSIFIED)

Joe,

Until we have an agreement, I would not turn off any travel arrangements. I understand that you need to review the changes we recommended and then put them into the stipulation. After you do so, we will need to review the stipulation again to ensure that it captures our intent. This process underscores why the Government should just send the stipulations to us in Word. The stipulations are a collaborative document and should be viewed as such. We can make the our changes by using Word's track changes function. Once we do, then you will either accept the changes or you won't.

Best,

David

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From: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US) [mailto:joedean.morrow.mil@mail.mil]  
Sent: Sunday, May 26, 2013 10:10 AM  
To: Tooman, Joshua J CPT USARMY (US); Hurley, Thomas F MAJ USARMY (US)  
Cc: Fein, Ashden MAJ USARMY MDW (US); 'coombs@armycourt martialdefense.com'; Bennett, Jessica D SSG USARMY (US)  
Subject: Re: Robertson stipulation (UNCLASSIFIED)

Josh,

I will take a closer look at your requests tonight, but I do not see any major issues with what you have proposed. If you agree, I would like to turn off travel for Robertson. Thoughts?

CPT Morrow  
571-305-3646

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, May 26, 2013 12:17 PM  
To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Hurley, Thomas F MAJ USARMY (US)  
Cc: Fein, Ashden MAJ USARMY MDW (US); 'David Coombs' <coombs@armycourt martialdefense.com>; Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Robertson stipulation (UNCLASSIFIED)

Joe

I was able to speak with SA Robertson this morning. Overall, I think we are very close. Just a few thoughts:

1. Please add a description of a preliminary forensic exam. Something like, "I conducted preliminary forensic examinations on a number of pieces of evidence seized in this case. A preliminary examination is a high level review taking no more than a couple hours, whereas a full forensic examination can take from one day to a full week."
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4. Paragraph 7e. Please change this so it is consistent with the AIR, "I reviewed a file that appeared to contain contact information for a member of the WikiLeaks Team. This contact information appeared to have been produced and released by the WikiLeaks team and did not appear to be of a personal nature."

5. Paragraph 7f. Please change to, "I also found an archive file that contained approximately 11,000 sensitive and classified documents, downloaded in Hyper Text Markup Language (HTML) format, though I did not note the exact number."

6. Paragraph 7, generally. Most subparagraphs indicate, "I know this because I collected..." This could be confusing because he specifically states in paragraph four that the evidence was collected at FOB Hammer and delivered to him at Camp Liberty. Not sure how to clarify this. Your thoughts?

Any issues, give me a call at 419-552-1211.

Thanks,

Josh

---

From: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Sent: Friday, May 24, 2013 11:23 AM  
To: Tooman, Joshua J CPT USARMY (US); Hurley, Thomas F MAJ USARMY (US)  
Cc: Fein, Ashden MAJ USARMY MDW (US)  
Subject: Robertson stipulation (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

Josh,

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CPT Joe Morrow

Trial Counsel

U.S. Army Military District of Washington

Phone: 202-685-1975

NIPR: jodean.morrow.mil@mail.mil

SIPR: jodean.morrow@jfhqncr.northcom.smil.mil

Classification: UNCLASSIFIED

Caveats: NONE

From: David Coombs  
To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Tooman, Joshua J CPT USARMY (US); Hurley, Thomas F MAJ USARMY (US)  
Cc: Fein, Ashden MAJ USARMY MDW (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Robertson stipulation (UNCLASSIFIED)  
Date: Sunday, May 26, 2013 10:27:27 AM

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To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Hurley, Thomas F MAJ USARMY (US)  
Cc: Fein, Ashden MAJ USARMY MDW (US); 'David Coombs' <coombs@armycourt martialdefense.com>;  
Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Robertson stipulation (UNCLASSIFIED)

Joe

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1. Please add a description of a preliminary forensic exam. Something like, "I conducted preliminary forensic examinations on a number of pieces of evidence seized in this case. A preliminary examination is a high level review taking no more than a couple hours, whereas a full forensic examination can take from one day to a full week."
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Josh

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Sent: Friday, May 24, 2013 11:23 AM  
To: Tooman, Joshua J CPT USARMY (US); Hurley, Thomas F MAJ USARMY (US)  
Cc: Fein, Ashden MAJ USARMY MDW (US)  
Subject: Robertson stipulation (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

Josh,

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CPT Joe Morrow

Trial Counsel

U.S. Army Military District of Washington

Phone: 202-685-1975

NIPR: jodean.morrow.mil@mail.mil

SIPR: jodean.morrow@jfhqncr.northcom.smi.mil

Classification: UNCLASSIFIED  
Caveats: NONE

**From:** David Coombs  
**To:** Fein, Ashden MAJ USARMY MDW (US); Tooman, Joshua J CPT USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US)  
**Cc:** Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
**Subject:** Mr. Adkins  
**Date:** Sunday, May 26, 2013 9:21:15 AM

---

Ashden,

Please provide me with the best contact information for Mr. Adkins. Thank you.

Best,

David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906

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[www.armycourtartialdefense.com](http://www.armycourtartialdefense.com) <<http://www.armycourtartialdefense.com>>

From: Fein, Ashden MAJ USARMY MDW (US)  
To: Tooman, Joshua J CPT USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US)  
Cc: "coombs@armycourt martialdefense.com"; Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: Re: Struttman Subpoena (UNCLASSIFIED)  
Date: Sunday, May 26, 2013 9:06:50 AM

---

Thank you.

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Sunday, May 26, 2013 10:47 AM  
To: Fein, Ashden MAJ USARMY MDW (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US)  
Cc: coombs@armycourt martialdefense.com <coombs@armycourt martialdefense.com>; Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Struttman Subpoena (UNCLASSIFIED)

Sir

Cyber Agents did not receive the documents. Also, Trent noticed a couple errors.

1. Their address is: 616 Pasadena Dr., Lexington, KY 40503
2. His last name is spelled Struttman. Two "N's" on the end.

Thanks,

Josh

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Friday, May 24, 2013 5:02 PM  
To: Tooman, Joshua J CPT USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US)  
Cc: coombs@armycourt martialdefense.com; Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Struttman Subpoena (UNCLASSIFIED)

Josh,

We sent Mr. Struttman his subpoena and travel worksheet via certified mail on 29 Apr 13. The tracking number is 7010 1060 001 1274 4460. We have not received the return receipt. A copy is attached to this email. Please have him let us know whether CyberAgents did not receive the documents.

v/r  
MAJ Fein

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Wednesday, May 22, 2013 3:08 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US)  
Cc: coombs@armycourtartialdefense.com; Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: Struttman Subpoena (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

Sir

Could you all send a subpoena to Trent? Doing so will ensure a subsequent subpoena for other cases doesn't slip in and complicate his presence.

Thanks,

Josh

Joshua J. Tooman

CPT, JA

Trial Defense Counsel

9990 Belvoir Drive

Fort Belvoir, VA 22060

Tel: (703) 805-4383

Fax: (703) 805-4413

joshua.tooman@us.army.mil

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Classification: UNCLASSIFIED

Caveats: NONE



From: Tooman, Joshua J CPT USARMY (US)  
To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Hurley, Thomas F MAJ USARMY (US)  
Cc: Fein, Ashdon MAJ USARMY MDW (US); "David Coombs"; Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Robertson stipulation (UNCLASSIFIED)  
Date: Sunday, May 26, 2013 8:17:51 AM

---

Joe

I was able to speak with SA Robertson this morning. Overall, I think we are very close. Just a few thoughts:

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Sent: Friday, May 24, 2013 11:23 AM  
To: Tooman, Joshua J CPT USARMY (US); Hurley, Thomas F MAJ USARMY (US)  
Cc: Fein, Ashden MAJ USARMY MDW (US)  
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Trial Counsel

U.S. Army Military District of Washington

Phone: 202-685-1975

NIPR: jodean.morrow.mil@mail.mil

SIPR: jodean.morrow@jfhqncr.northcom.smil.mil

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From: Tooman, Joshua J CPT USARMY (US)  
To: Fein, Ashden MAJ USARMY MDW (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US)  
Cc: coombs@armycourtartialdefense.com; Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Struttman Subpoena (UNCLASSIFIED)  
Date: Sunday, May 26, 2013 6:46:59 AM

---

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1. Their address is: 616 Pasadena Dr., Lexington, KY 40503
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Thanks,

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From: Fein, Ashden MAJ USARMY MDW (US)  
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To: Tooman, Joshua J CPT USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US)  
Cc: coombs@armycourtartialdefense.com; Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
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Josh,

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v/r  
MAJ Fein

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Wednesday, May 22, 2013 3:08 PM  
To: Fein, Ashden MAJ USARMY MDW (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US)  
Cc: coombs@armycourtartialdefense.com; Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
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Classification: UNCLASSIFIED

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To: Fein, Ashden MAJ USARMY MDW (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US)  
Cc: coombs@armycourt martialdefense.com; Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
Subject: RE: Struttman Subpoena (UNCLASSIFIED)  
Date: Saturday, May 25, 2013 7:54:23 PM

---

Thanks, sir.

---

From: Fein, Ashden MAJ USARMY MDW (US)  
Sent: Friday, May 24, 2013 5:02 PM  
To: Tooman, Joshua J CPT USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US)  
Cc: coombs@armycourt martialdefense.com; Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
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Caveats: NONE

From: David Coombs  
To: Fein, Ashden MAJ USARMY MDW (US); Whyte, J Hunter CPT USARMY (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: Re: Stipulation of Expected Testimony  
Date: Saturday, May 25, 2013 5:41:17 PM

---

Ashden,

That process works well when we are in the same area, however, having it in Word and using track changes is much quicker when we're not. Please send a Word version.

Best,  
David

----- Original message -----

From: "Fein, Ashden MAJ USARMY MDW (US)" <ashden.fein.mil@mail.mil>  
Date: 05/25/2013 4:50 PM (GMT-05:00)  
To: "'coombs@armycourtmarshialdefense.com'" <coombs@armycourtmarshialdefense.com>; "Whyte, J Hunter CPT USARMY (US)" <jeffrey.h.whyte.mil@mail.mil>; "Hurley, Thomas F MAJ USARMY (US)" <thomas.f.hurley4.mil@mail.mil>; "Tooman, Joshua J CPT USARMY (US)" <joshua.j.tooman.mil@mail.mil>  
Cc: "Bennett, Jessica D SSG USARMY (US)" <jessica.d.bennett.mil@mail.mil>; "Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)" <jodean.morrow.mil@mail.mil>; "Overgaard, Angel M CPT USARMY (US)" <angel.m.overgaard.mil@mail.mil>; "von Elten, Alexander S (Alec) CPT USARMY (US)" <alexander.s.vonelten.mil@mail.mil>; "Mitroka, Katherine F CPT USARMY (US)" <katherine.f.mitroka2.mil@mail.mil>; "Ford, Arthur D Jr CW2 USARMY (US)" <arthur.d.ford.mil@mail.mil>  
Subject: Re: Stipulation of Expected Testimony

David,

As we previously discussed regarding stips- we sent the pdf so if the defense has any issues then we can quickly reference defense requested changes without having to review the entire stip and keep moving the process along. We are working on many stips at one time using the agreed upon list. Please send what ever changes you would like so we can review just those changes and move on to the next stip.

Thank you.

Vr  
Ashden

----- Original Message -----

From: David Coombs [mailto:coombs@armycourtmarshialdefense.com]  
Sent: Saturday, May 25, 2013 04:10 PM  
To: Whyte, J Hunter CPT USARMY (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Fein, Ashden MAJ USARMY MDW (US)

Subject: RE: Stipulation of Expected Testimony

Please send me a Word version. Thank you.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
Local: (508) 689-4616  
Fax: (508) 689-9282  
coombs@armycourt martialdefense.com  
www.armycourt martialdefense.com

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-----Original Message-----

From: Whyte, J Hunter CPT USARMY (US) [mailto:jeffrey.h.whyte.mil@mail.mil]  
Sent: Friday, May 24, 2013 6:36 PM  
To: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Fein, Ashden MAJ USARMY MDW (US);  
'coombs@armycourt martialdefense.com'  
Subject: Stipulation of Expected Testimony

Gents,

Attached is a proposed stipulation of expected testimony for SSG Alejandro Marin. As you know, SSG Marin is currently deployed and he is also one of our first 25 witnesses. For that reason, can you please let us know your thoughts on the attached stipulation, so everyone (especially his command in theater) is on notice when we need to coordinate his travel for the court-martial? Thank you!

Have a good weekend!

v/r  
Hunter

From: Fein, Ashden MAJ USARMY MDW (US)  
To: "coombs@armycourtartialdefense.com"; Whyte, J Hunter CPT USARMY (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US)  
Subject: Re: Stipulation of Expected Testimony  
Date: Saturday, May 25, 2013 4:50:27 PM

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David,

As we previously discussed regarding stip- we sent the pdf so if the defense has any issues then we can quickly reference defense requested changes without having to review the entire stip and keep moving the process along. We are working on many stip at one time using the agreed upon list. Please send what ever changes you would like so we can review just those changes and move on to the next stip.

Thank you.

Vr  
Ashden

----- Original Message -----

From: David Coombs [<mailto:coombs@armycourtartialdefense.com>]  
Sent: Saturday, May 25, 2013 04:10 PM  
To: Whyte, J Hunter CPT USARMY (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Fein, Ashden MAJ USARMY MDW (US)  
Subject: RE: Stipulation of Expected Testimony

Please send me a Word version. Thank you.

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-----Original Message-----

From: Whyte, J Hunter CPT USARMY (US) [mailto:jeffrey.h.whyte.mil@mail.mil]

Sent: Friday, May 24, 2013 6:36 PM

To: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)

Cc: Bennett, Jessice D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY

USAMDW (US); Overgaard, Angel M CPT USARMY (US); von Elten, Alexander S

(Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D

Jr CW2 USARMY (US); Fein, Ashden MAJ USARMY MDW (US);

'coombs@armycourt martialdefense.com'

Subject: Stipulation of Expected Testimony

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Have a good weekend!

v/r

Hunter

From: David Coombs  
To: Whyte, J Hunter CPT USARMY (US); Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Fein, Ashden MAJ USARMY MDW (US)  
Subject: RE: Stipulation of Expected Testimony  
Date: Saturday, May 25, 2013 12:10:44 PM

---

Please send me a Word version. Thank you.

Best,  
David

David E. Coombs, Esq.  
Law Office of David E. Coombs  
11 South Angell Street, #317  
Providence, RI 02906  
Toll Free: 1-800-588-4156  
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-----Original Message-----

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To: Hurley, Thomas F MAJ USARMY (US); Tooman, Joshua J CPT USARMY (US)  
Cc: Bennett, Jessica D SSG USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US); von Elten, Alexander S (Alec) CPT USARMY (US); Mitroka, Katherine F CPT USARMY (US); Ford, Arthur D Jr CW2 USARMY (US); Fein, Ashden MAJ USARMY MDW (US); 'coombs@armycourt martialdefense.com'  
Subject: Stipulation of Expected Testimony

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Have a good weekend!

v/r  
Hunter





**From:** Fein, Ashden MAJ USARMY MDW (US)  
**To:** Tooman, Joshua J CPT USARMY (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US)  
**Cc:** coombs@armycourt martialdefense.com; Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
**Bcc:** Clark, Derek D SGT USARMY USAMDW (US); Ford, Arthur D Jr CW2 USARMY (US); Jorns, Claire V SGT USARMY (US); McLamb, Amber M SGT USARMY MDW (US); Parra, Jairo A (JPI) CW2 USARMY USAMDW (US); Carskadon, Amy F CIV (US); Mitroka, Katherine F CPT USARMY (US); von Elten, Alexander S (Allec) CPT USARMY (US); Whyte, J Hunter CPT USARMY (US)  
**Subject:** RE: Struttman Subpoena (UNCLASSIFIED)  
**Date:** Friday, May 24, 2013 5:02:00 PM  
**Attachments:** Struttman - letter.pdf  
Struttman - subpoena.pdf

---

Josh,

We sent Mr. Struttman his subpoena and travel worksheet via certified mail on 29 Apr 13. The tracking number is 7010 1060 001 1274 4460. We have not received the return receipt. A copy is attached to this email. Please have him let us know whether CyberAgents did not receive the documents.

v/r  
MAJ Fein

-----Original Message-----

**From:** Tooman, Joshua J CPT USARMY (US)  
**Sent:** Wednesday, May 22, 2013 3:08 PM  
**To:** Fein, Ashden MAJ USARMY MDW (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US)  
**Cc:** coombs@armycourt martialdefense.com; Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
**Subject:** Struttman Subpoena (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

Sir

Could you all send a subpoena to Trent? Doing so will ensure a subsequent subpoena for other cases doesn't slip in and complicate his presence.

Thanks,

Josh

Joshua J. Tooman

CPT, JA

Trial Defense Counsel

9990 Belvoir Drive

Fort Belvoir, VA 22060

Tel: (703) 805-4383

Fax: (703) 805-4413

joshua.tooman@us.army.mil

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Classification: UNCLASSIFIED

Caveats: NONE

From: Tooman, Joshua J CPT USARMY (US)  
To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Hurley, Thomas F MAJ USARMY (US)  
Cc: Fein, Ashden MAJ USARMY MDW (US); coombs@armycourt martialdefense.com  
Subject: RE: Robertson stipulation (UNCLASSIFIED)  
Date: Friday, May 24, 2013 11:34:05 AM

---

Classification: UNCLASSIFIED

Caveats: NONE

Thanks, Joe. I am still having trouble reaching him. We've exchanged a couple emails, but every time I call his DSN there is no answer.

Joshua J. Tooman  
CPT, JA  
Trial Defense Counsel  
9990 Belvoir Drive  
Fort Belvoir, VA 22060  
Tel: (703) 805-4383  
Fax: (703) 805-4413  
joshua.tooman@us.army.mil

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-----Original Message-----

From: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Sent: Friday, May 24, 2013 11:23 AM  
To: Tooman, Joshua J CPT USARMY (US); Hurley, Thomas F MAJ USARMY (US)  
Cc: Fein, Ashden MAJ USARMY MDW (US)  
Subject: Robertson stipulation (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

Josh,

Attached is the Calder Robertson stipulation. Let me know what you think as soon as you can. Are you still having trouble reaching him? He has not been readily accessible on our end either, but we let him know (again) that you wanted to speak with him. If I can facilitate further to wrap this up, let me know soon. Best time to reach out to Germany would be about now.

CPT Joe Morrow

Trial Counsel

U.S. Army Military District of Washington

Phone: 202-685-1975

NIPR: jodean.morrow.mil@mail.mil

SIPR: jodean.morrow@jfhqncr.northcom.smil.mil

Classification: UNCLASSIFIED

Caveats: NONE

Classification: UNCLASSIFIED

Caveats: NONE

**From:** Tooman, Joshua J CPT USARMY (US)  
**To:** Fein, Ashden MAJ USARMY MDW (US); Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Overgaard, Angel M CPT USARMY (US)  
**Cc:** coombs@armycourtmarshaldefense.com; Hurley, Thomas F MAJ USARMY (US); Bennett, Jessica D SSG USARMY (US)  
**Subject:** Struttman Subpoena (UNCLASSIFIED)  
**Date:** Wednesday, May 22, 2013 3:07:37 PM

---

Classification: UNCLASSIFIED

Caveats: NONE

Sir

Could you all send a subpoena to Trent? Doing so will ensure a subsequent subpoena for other cases doesn't slip in and complicate his presence.

Thanks,

Josh

Joshua J. Tooman

CPT, JA

Trial Defense Counsel

9990 Belvoir Drive

Fort Belvoir, VA 22060

Tel: (703) 805-4383

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joshua.tooman@us.army.mil

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Classification: UNCLASSIFIED

Caveats: NONE

From: Tooman, Joshua J CPT USARMY (US)  
To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Fein, Ashden MAJ USARMY MDW (US); Overgaard, Angel M CPT USARMY (US)  
Cc: David E. Coombs; Hurley, Thomas F MAJ USARMY (US)  
Subject: RE: SA Robertson (UNCLASSIFIED)  
Date: Wednesday, May 22, 2013 10:54:46 AM

---

Classification: UNCLASSIFIED

Caveats: NONE

Roger, thanks.

Joshua J. Tooman  
CPT, JA  
Trial Defense Counsel  
9990 Belvoir Drive  
Fort Belvoir, VA 22060  
Tel: (703) 805-4383  
Fax: (703) 805-4413  
joshua.tooman@us.army.mil

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-----Original Message-----

From: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US)  
Sent: Wednesday, May 22, 2013 10:48 AM  
To: Tooman, Joshua J CPT USARMY (US); Fein, Ashden MAJ USARMY MDW (US); Overgaard, Angel M CPT USARMY (US)  
Cc: David E. Coombs; Hurley, Thomas F MAJ USARMY (US)  
Subject: RE: SA Robertson (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

No, there shouldn't be any classified information.

CPT Joe Morrow  
Trial Counsel  
U.S. Army Military District of Washington  
Phone: 202-685-1975  
NIPR: jodean.morrow.mil@mail.mil  
SIPR: jodean.morrow@jfhqncr.northcom.smil.mil

-----Original Message-----

From: Tooman, Joshua J CPT USARMY (US)  
Sent: Wednesday, May 22, 2013 10:40 AM  
To: Morrow, JoDean (Joe) III CPT USARMY USAMDW (US); Fein, Ashden MAJ USARMY